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February 19, 2003

### **Ex Parte Presentation**

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

> Re: Application by SBC Communications Inc., et al. for Provision of In-Region, InterLATA Services in Michigan, WC Docket No. 03-16

Dear Ms. Dortch:

On behalf of SBC Communications Inc. ("SBC"), I am attaching copies of two letters that Cynthia J. Mahowald of SBC delivered recently to Michael Hirrel of the Department of Justice's Telecommunications Task Force.

In addition, representatives of SBC participated today on a conference call with representatives from the FCC's staff to discuss the pricing of directory assistance listings, reciprocal compensation, and collocation. The following participated on behalf of SBC: Scott J. Alexander, Kelly Ann Fennell, Martin E. Grambow, Travis M. Dodd, John D. Mason, Rebecca L. Sparks, Jared Craighead, Andrew Montalvo, and Geoffrey M. Klineberg. The following participated from the FCC: Monica Desai, Jennifer McKee, and Douglas Galbi.

In accordance with this Commission's Public Notice, DA 03-156 (Jan. 16, 2003), SBC is filing this letter electronically through the Commission's Electronic Comment Filing System. Thank you for your kind assistance in this matter.

Sincerely,

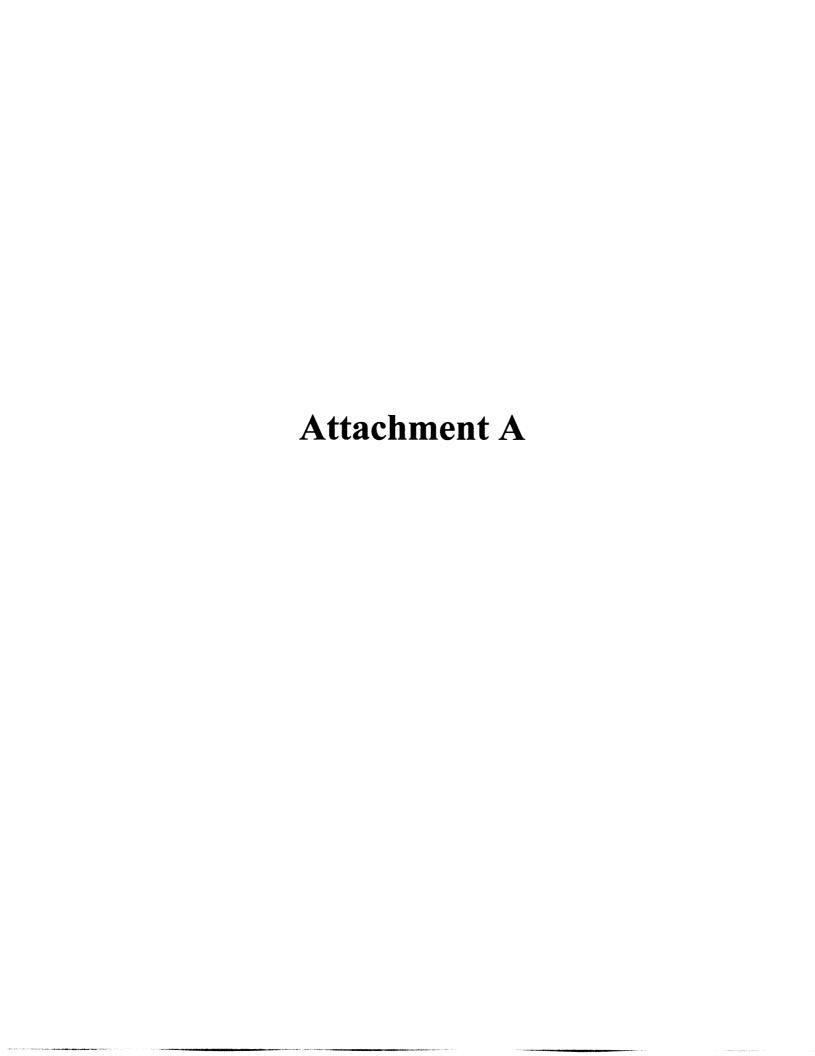
Geoffrey M. Klineberg

### Attachments

cc: John P. Stanley

Gina Spade Monica Desai Susan Pié

Layla Seirafi-Najar Dorothy Wideman Ann R. Schneidewind Qualex International





**Cynthia J. Mahowald**Vice President and
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February 14, 2003

Mike Hirrel, Esquire Telecommunications Task Force Antitrust Division U.S. Department of Justice 1401 H Street, N.W., Suite 8000 Washington, D.C. 20530

Re: Michigan 271, Docket 03-16.

Dear Mike:

Pursuant to your request, I am enclosing the Compliance and Improvement Plan Proposals for Michigan we filed yesterday, February 13, 2003.

Upon your review of the enclosed, please call me if you have any questions.

Sincerely,

Cynthia J. Mahowald

Vice President and General Counsel

Maharaldfor

**Enclosures** 

cc: Brent Marshall

Layla Seirafi-Najar



February 13, 2003

215 S. WASHINGTON SQUARE, SUITE 200 LANSING, MICHIGAN 48933-1816 TELEPHONE: (517) 371-1730 FACSIMILE: (517) 487-4700 http://www.dickinson-wright.com

WILLIAM J. CHAMPION III wchampion@dickinsonwright.com

**Via Hand Delivery** 

Dorothy Wideman Executive Secretary Michigan Public Service Commission 6545 Mercantile Way Lansing, MI 48909

Re: In the matter, on the Commission's own motion, to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 of the federal Telecommunications Act of 1996.

Case No. U-12320

Dear Ms. Wideman:

Please find enclosed for filing the original and 4 copies of *SBC's Compliance and Improvement Plan Proposals* and *Proof of Service*.

If you should have any questions, please contact me. Thank you.

Very truly yours,

William J. Champion III

WJC/mds Enclosures

cc: Parties of Record, w/encl.

#### STATE OF MICHIGAN

### BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 of the federal Telecommunications Act of 1996.	) ) ) )	Case No. U-12320				
PROOF OF SERVICE						

STATE OF MICHIGAN	)
	) ss
COUNTY OF INGHAM	)

Mindy D. Smith, being first duly sworn, deposes and says she is employed at Dickinson Wright PLLC; and that on February 13, 2003 she served a copy of *SBC's Compliance and Improvement Plan Proposals* upon the attached service list via email and first class mail by depositing the same in a United States postal depository, enclosed in an envelope, bearing postage fully prepaid in Lansing, Michigan.

Mindy D. Smith

Subscribed and sworn to before me, a Notary Public in and for said County, this 13<sup>th</sup> day of February, 2003.

alicia M. Ball

Alicia M. Ball, Notary Public Ingham County, Michigan

My Commission Expires: 01/07/06

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#### STATE OF MICHIGAN

### BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,	)	
to consider Ameritech Michigan's compliance	)	
with the competitive checklist in Section 271 of	)	Case No. U-12320
the federal Telecommunications Act of 1996.	)	
	)	

### SBC'S COMPLIANCE AND IMPROVEMENT PLAN PROPOSALS

By minute action dated January 13, 2003, the Commission approved its consultative report to the FCC finding that SBC has demonstrated compliance with Section 271 of the federal Telecommunications Act. On January 13, 2003, the Commission also entered an Opinion and Order ("January 13 Order") in which it noted that "there are aspects of SBC's current performance that could be improved, and SBC has proposed to make improvements in some areas." Accordingly, the January 13 Order required SBC to file revised compliance and improvement plans on or before February 13, 2003.<sup>2</sup>

Specifically, the Commission directed SBC to submit compliance plans with respect to Customer Service Record (CSR) and Directory Listing database accuracy<sup>3</sup>, and trouble report closure coding.<sup>4</sup> In addition, the Commission directed SBC to submit compliance or improvement plans with respect to line loss notifiers<sup>5</sup>, pre-order timeliness<sup>6</sup>, change management<sup>7</sup>, and billing auditability.<sup>8</sup> To the extent applicable, the Commission directed SBC

<sup>2</sup> *Id.*, at 13.

<sup>&</sup>lt;sup>1</sup> *Id.*, at 1.

<sup>3</sup> *Id.*, at 8.

Id., at 8-9.

<sup>5</sup> *Id.*, at 6.

<sup>&</sup>lt;sup>6</sup> *Id.*, at 5.

<sup>&</sup>lt;sup>7</sup> *Id.*, at 10.

<sup>8</sup> *Id.*, at 9.

to detail the progress that has resulted, and further actions that remain to be taken, since SBC filed its initial compliance plans on October 30, 2002.

In compliance with the Commission's January 13 Order, SBC submits herewith the following draft compliance or improvement plans:

Attachment A	Customer Service Inquiry Accuracy Compliance Plan
Attachment B	Directory Listings and Directory Assistance Database Accuracy Compliance Plans
Attachment C	Special Service and UNE Repair Coding Accuracy Compliance Plan
Attachment D	Line Loss Notifier Communications Improvement Plan
Attachment E	Pre-Order Processing Timeliness Improvement Plan
Attachment F	Change Management Communications Improvement Plan
Attachment G	Bill Auditability Improvement Plan

These draft compliance plans reflect revisions to the initial plans filed in this matter on October 30, 2002 to comply with the Commission's January 13, 2003 Order, and accordingly take into account questions raised by CLECs in written comments and during the November 25, 2002 hearing regarding SBC's initial plans. SBC recognizes that further modifications to these plans may be appropriate based on the collaborative session scheduled for March 4-5, 2003. As a result, SBC will submit modified plans to the Commission by March 13, 2003.

The January 13 Order also directed that the compliance plans clearly specify the utilization of the third-party contractor. 9 As stated in Attachments A, B and C, and subject to any further direction from the Commission, SBC intends to engage BearingPoint to conduct the third party review as described in these three compliance plans. Accordingly, SBC has provided draft

*Id.*, at 4.

copies to BearingPoint for an initial review and requested that it attend the March 4-5, 2003 collaborative. BearingPoint's initial response is attached as Attachment H.

Finally, the January 13 Order directed SBC to file monthly reports with the Commission for a minimum of six months identifying line loss issues that developed during the month. The report for January 2003 is attached as Attachment I. As noted in the Line Loss Notifier Communications Improvement Plan, SBC recognizes that the format for future reports may be modified.

Respectfully submitted,

Craig A. Anderson (P28968) AMERITECH MICHIGAN 444 Michigan Avenue, Room 1750 Detroit, Michigan 48226 (313) 223-8033

and

**DICKINSON WRIGHT PLLC** 

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(517) 371-1730

Dated: February 13, 2003

LANSING 34060-104 313115



# MPSC Case No. U-12320

# **Draft Compliance Plan**

For

**Customer Service Inquiry Accuracy** 

**February 13, 2003** 

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## 1. Purpose

The purpose of this revised draft compliance plan is to describe the actions Michigan Bell Telephone Company ("SBC") proposes to take to improve certain aspects of Customer Service Inquiry ("CSI") accuracy. SBC originally proposed a CSI compliance plan on October 30, 2002 ("October 30 Compliance Filing"). As directed by the Michigan Public Service Commission's ("MPSC's") Order issued on January 13, 2003 ("January 13 Order"), in Case No. U-12320, this draft has been revised to further address the operational concerns with CSI accuracy identified in BearingPoint's Report, and those discussed in the technical workshop and submitted in written comments. SBC recognizes that further modifications to this plan may be appropriate based on the collaborative session scheduled for March 4 – 5, 2003. As a result, SBC will submit a modified compliance plan to the MPSC by March 13, 2003. Subject to any further direction from the MPSC, SBC intends to retain BearingPoint to evaluate SBC's implementation of the final compliance plan.

### 2. Issue Definition

BearingPoint (f/k/a KPMG Consulting) first raised this issue in Exception 33 as part of the Third Party Operations Support Systems ("OSS") testing on January 28, 2002 stating that they have observed instances where SBC has failed to accurately update the Customer Service Inquiry ("CSI") records. In this test, information contained within the CSR extract returned by a Customer Service Inquiry was evaluated for accuracy against field inputs from submitted Test CLEC orders, i.e., Local Service Requests ("LSRs"). In the course of evaluating this issue, BearingPoint retested CSI accuracy three times over a nine-month period. On October 24, 2002, SBC requested that no further retesting be performed, and a final disposition report was issued on November 14, 2002. BearingPoint's October 30, 2002 OSS Test Report found that test criteria for TVV-27 was "not satisfied."

In response to BearingPoint's evaluation, SBC implemented system modifications and process improvements that improved tested performance from 88% to 92%; the MPSC found the difference between 92% and the 95% benchmark selected by BearingPoint was not indicative of discriminatory behavior<sup>1</sup>. SBC believes that the remaining errors identified in the OSS test are either immaterial in terms of billing or provisioning, or are associated with product ordering scenarios not widely seen in the commercial environment.

# 3. Root Cause Analysis

The process for updating a customer service record ("CSR") begins when a CLEC submits a local service request ("LSR") to migrate, install, convert, change or disconnect

<sup>&</sup>lt;sup>1</sup> MPSC Report, January 13, 2003, pg. 67 – "[T]he Commission does not believe that the amount by which the benchmark has been missed is of a level of significance to indicate discriminatory behavior on the part of SBC and failure of an opportunity to provide CLECs a reasonable opportunity to compete."

network elements or services. When provisioning work is completed, SBC creates and stores an updated CSR in the SBC Midwest Customer Information System ("ACIS"). A CLEC may obtain access to a CSR by issuing a customer service inquiry ("CSI") using Verigate, EDI or CORBA interfaces.

In its analysis of the results provided by the BearingPoint test, SBC determined that the primary cause of CSI inaccuracies was errors on manually-handled Resale and UNE-P service orders. In these situations, the data on the CLEC-submitted LSR was not accurately input on the internal service order by the SBC service representative. Any inaccuracy on the service order is then reflected in the ACIS CSR database when the database is updated upon order completion.

These manually-handled service orders are generally associated with the ordering of complex products. CSIs for other products were successfully tested by BearingPoint and, thus, do not need to be addressed in this compliance plan.<sup>2</sup>

### 4. Actions

The compliance plan for CSI Accuracy proposed by SBC in its October 30 Compliance Filing was constructed to address the reliability and accuracy of manual service orders. The plan included the development and delivery of a quality awareness training package to the hundreds of SBC service representatives that handle CLEC service orders. Additionally, it called for the implementation of a service order quality review process consisting of reviews of daily production service orders, corrections of identified errors, and coaching and/or process/system improvements based on data gathered from the review process.

The MPSC in its January 13 Order indicated that the CSI Accuracy compliance plan should be expanded, to the extent possible, to address the specific comments of AT&T. In reference to the CSI Accuracy compliance plan, AT&T made recommendations regarding the content of the service representative training package, the period of the training, the scope of the quality improvement effort, a commitment by SBC to fix errors identified as part of its quality review, and the potential need for a performance measure of CSI Accuracy. SBC has addressed the requirements of the MPSC and responded to the comments of AT&T in the following enhanced plan.

SBC is taking the following steps to improve the accuracy of CSI:

AT&T questioned why more products were not included in this compliance plan in its 11/15/02 comments; see Connolly affidavit, pp. 20 & 22; ¶¶ 45 & 50.

See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 23, ¶ 51. SBC does not believe that a separate performance measure is necessary. Performance measure changes are generally discussed in the performance measure six-month review; one of which is just concluding.

### 1. <u>Service Representative Training</u>

SBC developed for Local Service Center ("LSC") Service Representatives a Service Order Quality informational package <sup>4</sup> directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during the training of service representatives involved in producing ACIS service orders. This package provides information such as SBC management's commitment to quality order processing, the importance of accurate orders, and the impacts of inaccurate orders on CLECs and end-users. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, 2002.

- Starting in January 2003<sup>5</sup>, service representatives will receive training using the Service Order Quality informational package.
  - o The training is scheduled to be completed by May 31, 2003 with a majority of targeted Service Representatives trained by March 31, 2003.
  - The intended audience for training is service representatives that produce and process Resale and UNE-P service orders for the ACIS system.
  - o Review of the package is accomplished in mandatory training sessions facilitated by SBC's Training Department. Logs will be maintained to track attendance and manage attendance compliance.
  - A General Manager, Area Manager or Line Manager will address each class with a list of Talk Points to emphasize management's commitment to this process.

### 2. CSI Quality Review

• SBC is designing a quality review process for CSI accuracy<sup>6</sup>. This review will rely on sampling UNE-P and Resale production service orders to monitor CSI accuracy<sup>7</sup>.

See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 19, ¶ 43. SBC has expanded the detail provided in this compliance plan to address the description of the information contained in the training package as well as its goal, and inclusion of a review of that information package by the third party contractor.

See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 20, ¶ 44. SBC has expanded the detail provided in this compliance plan to address specific timeframes for each action item, including component items of each action item.

See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 21, ¶ 46. SBC has expanded the detail provided in this compliance plan to address the description of how SBC is designing its quality review process, including sampling, frequency, timing, and how accuracy will be determined, as well as describing the purpose of this type of quality review process. SBC is unable to comment on how the third party may design its sampling plan.

This mechanism will enable SBC to monitor the effectiveness of its training and help identify potential corrective actions. These quality reviews will be conducted on a frequent, on-going basis. Initially, the reviews are intended to be conducted daily.

- Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision Support System (DSS), which is a reporting system used by the LSC to track and capture information on order activity.
- o The criteria for sampling will include product type and status. Sampled orders will come from pending orders, i.e., orders not yet completed.
- o Quality Assurance ("QA") service representatives, experienced service representatives selected for this purpose, will conduct reviews using Methods and Procedures developed specifically for this process.
- o Potential order discrepancies will be reviewed to:
  - Verify that discrepancies are in fact errors;
  - Correct identified errors;
  - Identify root causes of errors;
  - Provide the basis for individual coaching of service representatives.
- o The service representatives will compare the CLEC LSR to the corresponding internal service order on a field by field basis. Corrections will be made as necessary prior to order completion.

#### 3. Corrective Actions

• SBC plans to address discrepancies identified during its quality reviews as described above in the following manner:<sup>8</sup>

See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 21, ¶ 47 and pp. 19-22, ¶¶ 42, 45, 48, and 49. SBC has recognized that errors have been caused by manual handling of orders; thus, the emphasis on the training package and dissemination of same to LSC service representatives. The quality review process will assure that accuracy improves and will be maintained. SBC has expanded the detail provided in this compliance plan to address the description of how SBC will use the information collected from the quality review process to institute correction of identified errors, provide service representative coaching, as well as to ascertain needed improvements in processes, systems, and/or training.

See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 20, ¶ 45 and pg. 22, ¶ 50. During the BearingPoint test, only the UNE-P and Resale product types did not meet BearingPoint's benchmark. One issue had been identified in relation to unbundled loops during the test; however, that issue was corrected and the correction confirmed by BearingPoint. Thus, it is unnecessary to review all product types.

- o Review results will be documented in a new LSC database to track performance, identify trends, and provide reports for LSC management.
- o Information on the errors and root cause(s) identified will be analyzed using tracked data to ascertain if common issues or trends are apparent.
- o This information will be used to determine whether individual service representative coaching is needed, or if additional training, changes to processes, methods and procedures and/or systems are needed. SBC will implement appropriate corrective actions as warranted, including additional training and/or changes to processes or systems.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status
Quality Assurance-Related Tasks			
Develop Service Order Quality informational package and provide training to all LSC UNE-P and Resale Service Representatives.	11/15/02	5/31/03	In progress
A. Determine and assign resource to lead "informational package" development effort	11/15/02	12/31/02	Complete
B. Produce "informational package"	12/01/02	12/31/02	Complete
C. Determine training deployment method	12/01/02	01/06/03	Complete
D. Create training schedule or plan	12/01/02	01/14/03	Complete
E. Conduct training	01/15/03	05/31/03	In progress
<ol> <li>Design and implement a quality review process for validating the accuracy of the ACIS CSI record updates, which includes both sampling and quality reviews Unbundled Network Elements – Platform ("UNE-P") and Resale orders.</li> </ol>	12/15/02	Ongoing	In progress
A. Design quality review process  B. Implement daily quality review of Resale and UNE -P  Complex orders	12/15/02 02/03/03	1/31/03 Ongoing	Complete In progress
Identify root causes of errors identified by quality review and sampling processes	12/15/02	Ongoing	In progress
A. Develop identification and tracking process	12/15/02	2/5/03	Complete
B. Identify training or other 'correcting' opportunities	02/03/03	Ongoing	In progress
C. Implement corrective actions	02/03/03	Ongoing	In progress

### 5. Third Party Examination Approach

Upon completion of the above described training program and after an appropriate period of internal quality review as determined by SBC, the accuracy of Customer Service Record updates is expected to improve when compared to BearingPoint's test results of 92% accurate. SBC's target is 95% accuracy. If the third party evaluation does not show the target has been achieved, any further required action will be determined by the MPSC. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include the following:

- The third party will review accuracy of customer service inquiry updates by comparing CSR updates with the local service requests for such activity using a sample from commercial production. The sample design and the evaluation methodology will be reviewed with SBC and with the MPSC staff prior to its implementation.
- The third party will evaluate SBC's implementations of the actions described in this compliance plan by reviewing documents, conducting interviews, and performing site visits. This evaluation will include a review of SBC's quality review results.



# MPSC Case No. U-12320

# **Draft Compliance Plan**

For

**Directory Listings &** 

**Directory Assistance Database** 

**Update Accuracy** 

**February 13, 2003** 

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2.	ISSUE DEFINITION	1
	ROOT CAUSE ANALYSIS	
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	THIRD PARTY EXAMINATION APPROACH	

## 1. Purpose

The purpose of this revised draft compliance plan is to describe the actions Michigan Bell Telephone Company ("SBC") proposes to take to improve certain aspects of directory listings and directory assistance database ("DL/DA") accuracy. SBC originally proposed a DL/DA compliance plan on October 30, 2002 ("October 30 Compliance Filing"). As directed by the Michigan Public Service Commission's ("MPSC's") Order issued on January 13, 2003 ("January 13 Order"), in Case No. U-12320, this draft has been revised to further address the operational concerns with DL/DA accuracy identified in BearingPoint's Report, and those discussed in the technical workshop and submitted in written comments. SBC recognizes that further modifications to this plan may be appropriate based on the collaborative session scheduled for March 4 – 5, 2003. As a result, SBC will submit a modified compliance plan to the MPSC by March 13, 2003. Subject to any further direction from the MPSC, SBC intends to retain BearingPoint to evaluate SBC's implementation of the final compliance plan.

### 2. Issue Definition

BearingPoint (f/k/a KPMG Consulting) first raised this issue in Exception 52 as part of the Third Party Operations Support Systems ("OSS") testing on March 21, 2002 stating that they have observed instances of incorrect updates to SBC's directory assistance database. In this test, information contained within the directory listings and directory assistance database were evaluated for accuracy against field inputs from submitted Test CLEC orders, i.e., Local Service Requests ("LSRs"). In the course of evaluating this issue, BearingPoint retested DL/DA accuracy three times over a six-month period. On November 11, 2002, SBC requested that no further retesting be performed, and a final disposition report was issued on November 18, 2002. BearingPoint's October 30, 2002 OSS Test Report found that test criteria for TVV4-1 was "not satisfied."

In response to BearingPoint's evaluation, SBC implemented system modifications and process improvements that improved tested performance from 57% to 91.2%; the MPSC found the difference between 91.2% and the 95% benchmark selected by BearingPoint was not indicative of discriminatory behavior<sup>1</sup>. SBC believes that the remaining errors identified in the OSS test are either immaterial in terms of billing or provisioning, or are associated with product ordering scenarios not widely seen in the commercial environment.

### 3. Root Cause Analysis

The process for updating the directory assistance database begins when a CLEC submits a local service request ("LSR") or a stand-alone directory service request ("DSR") that requests an update to directory listing ("DL") names, addresses or telephone numbers.

MPSC Report, January 13, 2003, pg. 67 – "[T]he Commission does not believe that the amount by which the benchmark has been missed is of a level of significance to indicate discriminatory behavior on the part of SBC and failure of an opportunity to provide CLECs a reasonable opportunity to compete."

(An LNP-only request requires the CLEC to submit a separate DL service request.) During the process a directory listing is modified based on the information provided by the CLEC in the LSR or DSR.

In its analysis of the results provided by the BearingPoint test, SBC had determined that the primary cause of DL/DA update inaccuracies was intermittent errors on manually handled orders and generally associated with complex listings. In essence, the errors were caused by Service Representatives handling complex listings and orders flagged by automatic processes.

### 4. Actions

The compliance plan for DL/DA update accuracy proposed by SBC in its October 30 Compliance Filing was constructed to address the reliability and accuracy of manual service orders. The plan included systems modifications, manual process updates, and the development and delivery of a quality awareness training package to the hundreds of SBC service representatives that handle CLEC service orders. Additionally, it called for the implementation of a service order quality review process consisting of reviews of daily production service orders, corrections of identified errors, and coaching and/or process/system improvements based on data gathered from the review process.

The MPSC in its January 13 Order indicated that the DL/DA update accuracy compliance plan should be expanded, to the extent possible, to address the specific comments of AT&T. In reference to the DL/DA Update Accuracy Compliance Plan, AT&T made reference to: how the system enhancements address the issues at hand; when and where the system enhancements are from; the purpose of the manual work-around and how it is different from current practices, the limited nature of the long-term mechanism as it applies to one error type, as well as the same issues raised with the Customer Service Inquiry ("CSI") Accuracy Compliance Plan (the content of the service representative training package, the period of the training, the scope of the quality improvement effort, a commitment by SBC to fix errors identified as part of its quality review, and the potential need for a performance measure<sup>2</sup>). SBC has addressed the requirements of the MPSC and responded to the comments of AT&T in the following enhanced plan.

SBC is taking the following steps to improve the accuracy of DL/DA:

#### 1. System and Process Enhancements

• SBC installed vendor software updates to allow automated daily transfers of Mechanized Order Receipt ("MOR") files to the Advance Listing Products and Services System ("ALPSS"), in December 2002.<sup>3</sup>

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See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 23, ¶¶ 57-61. SBC does not believe that a separate performance measure is necessary. Performance measure changes are generally discussed in the performance measure six-month review; one of which is just concluding.

See AT&T's comments filed 11/15/02, Connolly affidavit at p. 25, ¶ 57. SBC has provided detail on the vendor updates and the issues that it addresses.

- o This automated task replaces a manual process that was performed periodically throughout the day and occasionally executed prior to the MOR data being available, thus delaying the update.
- o This enhancement will ensure an improvement in timely receipt of mechanized orders, as manual intervention will be minimized/eliminated.
- SBC implemented an interim manual work process in December 2002 to resolve ALPSS errors identified in the "Skipped Section Report" within three business days.<sup>4</sup>
  - o This new daily work process will ensure the minimization of "Skipped Section Report" backlogs and in turn will improve the timely handling of errors identified by ALPSS. As a result, the DL/DA update accuracy will improve through better error handling.
- SBC will implement a long term mechanical process to route orders identified by the "Skipped Section Report" into the established ALPSS error handling process by March 1, 2003. 5
  - While not replacing the "Skipped Section Report" manual work process, this
    enhancement will further automate the ALPSS error handling and minimize
    manual processes by better identifying errors that would otherwise be handled
    manually.

SBC is taking the following steps to improve the accuracy of DL/DA updates:

### 2. Service Representative Training

SBC developed for Local Service Center ("LSC") Service Representatives a Service Order Quality informational package directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during the training of service representatives involved in producing ACIS service orders. This package provides information such as SBC management's commitment to quality order processing, the importance of accurate orders, and the impacts of inaccurate orders on CLECs and end-users. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, 2002.

- Starting in January 2003, service representatives will receive training using the Service Order Quality informational package.
  - o The training is scheduled to be completed by May 31, 2003 with a majority of targeted Service Representatives trained by March 31, 2003.
  - The intended audience for training is service representatives that produce and process Resale and UNE-P service orders for the ACIS system.

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See AT&T's comments filed 11/15/02, Connolly affidavit at p. 26, ¶ 58. SBC has provided detail the issue being addressed by the interim manual process.

See AT&T's comments filed 11/15/02, Connolly affidavit at p. 26, ¶ 59. SBC has provided detail what the long term mechanism addresses.

- o Review of the package is accomplished in mandatory training sessions facilitated by SBC's Training Department. Logs will be maintained to track attendance and manage attendance compliance.
- A General Manager, Area Manager or Line Manager will address each class with a list of Talk Points to emphasize management's commitment to this process.

### 3. DL/DA Quality Review

- SBC is designing a quality review process for DL/DA update accuracy. This review will rely on sampling UNE-P and Resale production service orders to monitor DL/DA update accuracy. This mechanism will enable SBC to monitor the effectiveness of its training and help identify potential corrective actions. These quality reviews will be conducted on a frequent, on-going basis. Initially, the reviews are intended to be conducted daily.
  - Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision Support System (DSS), which is a reporting system used by the LSC to track and capture information on order activity.
  - o The criteria for sampling will include product type and status. Sampled orders will come from pending orders, i.e., orders not yet completed.
  - o Quality Assurance ("QA") service representatives, experienced service representatives selected for this purpose, will conduct reviews using Methods and Procedures developed specifically for this process.
  - o Potential order discrepancies will be reviewed to:
    - Verify that discrepancies are in fact errors;
    - Correct identified errors:
    - Identify root causes of errors;
    - Provide the basis for individual coaching of service representatives.
  - o The service representatives will compare the CLEC LSR to the corresponding internal service order on a field by field basis. Corrections will be made as necessary prior to order completion.

### 4. Corrective Actions

- SBC plans to address discrepancies identified during its quality reviews as described above in the following manner:
  - o Review results will be documented in a new LSC database to track performance, identify trends, and provide reports for LSC management.
  - o Information on the errors and root cause(s) identified will be analyzed using tracked data to ascertain if common issues or trends are apparent.

o This information will be used to determine whether individual service representative coaching is needed, or if additional training, changes to processes, methods and procedures and/or systems are needed. SBC will implement appropriate corrective actions as warranted, including additional training and/or changes to processes or systems.

The following table provides the schedule for the actions discussed in this section:

	Task	Begin	End	Status
Sy	stem-Related Tasks			
1.	Implement system changes to allow automated daily file transfers of MOR files to AAS/IT	10/28/02	12/31/02	Completed
	A. Develop and test AAS/IT Interface software modification	10/28/02	11/01/02	Completed
	B. Develop MOR Interface modification	10/28/02	11/01/02	Completed
	C. Install MOR Interface modification	11/10/02	12/31/02	Completed
2.	Implement interim manual work process for ALPSS errors identified in the "Skipped Section Report" within three business days	10/01/02	Ongoing	In progress
	A. Review existing process to determine backlog avoidance	10/01/02	11/01/02	Completed
	B. Implement interim manual work process	11/01/02	12/01/02	Completed
	C. Managers report weekly backlog information (numbers, age, etc.)	12/01/02	Ongoing	In progress
	D. Manager evaluates Skipped Section Report and takes action to ensure a backlog does not occur	12/01/02	Ongoing	In progress
3.	Implement system changes to ALPSS error handling process to route orders identified by the "Skipped Section Report"	11/13/02	03/03/03	In progress
	A. Receive ALPSS new software version from vendor	11/13/02	11/13/02	Completed
	B. Perform testing	11/14/02	02/02/03	In progress
	C. Installed in production	03/01/03	03/03/03	
Qu	ality Assurance-Related Tasks			
р	Develop Service Order Quality informational package and provide training to all LSC UNE-P and Resale Service Representatives.	11/15/02	5/31/03	In progress
A	A. Determine and assign resource to lead "informational package" development effort	11/15/02	12/31/02	Complete
E	Produce "informational package"	12/01/02	12/31/02	Complete
	C. Determine training deployment method	12/01/02	01/06/03	Complete
	D. Create training schedule or plan	12/01/02	01/14/03	Complete

Task	Begin	End	Status
E. Conduct training	01/15/03	05/31/03	In progress
5. Design and implement a quality review process for validating the accuracy of the ACIS DL/DA record updates, which includes both sampling and quality reviews Unbundled Network Elements – Platform ("UNE-P") and Resale orders.	12/15/02	Ongoing	In progress
A. Design quality review process B. Implement daily quality review of Resale and UNE -P Complex orders	12/15/02 02/03/03	1/31/03 Ongoing	Complete In progress
6. Identify root causes of errors identified by quality review and sampling processes	12/15/02	Ongoing	In progress
A. Develop identification and tracking process	12/15/02	2/5/03	In progress
B. Identify training or other 'correcting' opportunities	02/03/03	Ongoing	In progress
C. Implement corrective actions	02/03/03	Ongoing	In progress

### 5. Third Party Examination Approach

Upon completion of the above described training program and after an appropriate period of internal quality review as determined by SBC, the accuracy of DL/DA updates is expected to improve when compared to BearingPoint's test results of 91.2% accurate. SBC's target is 95% accuracy. If the third party evaluation does not show the target has been achieved, any further required action will be determined by the MPSC. While the third party selected will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include the following:

The third party will review accuracy of DL/DA updates by comparing updates with local service requests using a sample from commercial production. The sample design and the evaluation methodology will be reviewed with SBC and the Commission staff prior to its implementation.

The third party will affirm SBC's implementations of the actions described in this compliance plan by reviewing documents, conducting interviews, and performing site visits. This evaluation will include a review of SBC's self-audit results.



# MPSC Case No. U-12320

# **Draft Compliance Plan**

For

**Special Service and UNE Repair Coding Accuracy** 

**February 13, 2003** 

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## 1. Purpose

The purpose of this draft compliance plan is to describe the actions Michigan Bell Telephone Company's ("SBC's") proposes to take to improve the accuracy and completeness¹ of closeout codes upon repair completion for Special Services and Unbundled Network Elements (UNEs). SBC originally proposed a trouble report closeout code improvement plan on October 30, 2002 ("October 30 Compliance Filing"). As directed by the Michigan Public Service Commission's (MPSC's) Order issued on January 13, 2003 ("January 13 Order"), in Case No. U-12320, this draft has been revised to be a compliance plan. It also addresses the operational concerns identified in BearingPoint's Report, and those discussed in the technical workshop and submitted in written comments. SBC recognizes that further modifications to this plan may be appropriate based on the collaborative session scheduled for March 4 – 5, 2003. As a result, SBC will submit a modified compliance plan to the MPSC by March 13, 2003. Subject to any further direction from the MPSC, SBC intends to retain BearingPoint to evaluate SBC's implementation of the final compliance plan.

### 2. Issue Definition

BearingPoint (f/k/a KPMG Consulting) first issued Exception 131 as part of the Third-Party Operations Support Systems (OSS) testing on June 27, 2002. In its report, BearingPoint stated that in reviewing trouble reports and close out code data, it determined that SBC had failed to meet a 95% accuracy benchmark for trouble ticket closure coding for Special Service and UNE circuits. The initial exception report for Michigan had included benchmark failures for Resale, UNE and Special Service circuits. In the course of resolving this issue, BearingPoint completed a retest of repair coding accuracy in August 2002 and reported that while Resale circuits had passed their test requirements, UNE and Specials had not. This exception encompassed all five Midwest states. BearingPoint's October 30, 2002 OSS Test Report found that test criteria for TVV7-12 and TVV7-14 were "not satisfied." In its final retest for Michigan, BearingPoint reported that 84.8% (56/66) of UNE closeouts and 82.1% (23/28) of Special Service closeouts were coded correctly. The UNE coding has successfully closed in the other four SBC Midwest states and Special Service coding remains in retest in Illinois. Wisconsin has successfully completed Special Service coding retesting.

In response to BearingPoint's evaluation, SBC has identified problem areas and implemented a number of corrective measures, which as summarized above, have improved the performance results in those states where the retest was conducted after those corrective measures were implemented<sup>2</sup>. In its final retest in Michigan,

AT&T stated, "accuracy is equally important as completeness." See, 11/15/02 Connolly Affidavit, p. 36, para 83

The retest in Michigan was completed prior to the implementation of these initiatives.

BearingPoint reported that 84.8% (56/66) of UNE closeouts and 82.1% (23/28) of Specials were coded correctly.

## 3. Root Cause Analysis

Trouble tickets are closed out by the repairing technician in the field or in the central office. When the repair is complete, the technician also enters the appropriate closure codes to the ticket. The closeout code faults reported by BearingPoint within this exception appeared to fall into one of the following general situations:

- 1) Situations in which the fault inserted by BearingPoint was subsequently reported as "No Trouble Found" (NTF) by SBC.
- 2) Situations in which the fault inserted by BearingPoint on the network side of the circuit was subsequently reported as being within the customer-owned portion of the circuit and for which CLEC billing was applied.
- 3) Situations the same as Item #2 above, but no CLEC billing was applied.
- 4) Situations in which the fault inserted by BearingPoint on the network side of the circuit was properly repaired, but the coding used did not accurately identify exactly where the fault had occurred.

A few of the items in Situation #1 above involved cases in which SBC clearly miscoded the actual trouble cause and repair. However, most of the cases involved situations in which BearingPoint had inserted multiple faults in the same test bed area for several test circuits. While dispatched to repair the fault on one circuit, the technician noticed faults placed on several additional circuits<sup>3</sup> and repaired them as well. The technician corrected the multiple faults but did not document the work performed on those additional circuits that needed repair, but were not listed on the trouble ticket for the test circuit. Therefore, when dispatches were made on the reported failures of the additional circuits, the dispatched technician appropriately closed the report as "NTF".

For items that fell within Situation #2 and #3, the errors appear to have been caused by a lack of attention to, or unfamiliarity with, the meaning of each disposition code. Although such performance is unacceptable, it did not have a significant impact on either CLEC billing or repair performance reporting. Indeed, of the 25 reported errors in coding (out of 136 total retests), only 3 would have resulted in either inappropriate billing or erroneous exclusion of data from performance results. This represents an overall billing/performance error rate of only 2.2 percent.

Similarly, the items found to fall into Situation #4 appear to be mostly due to errors by the repair technician. These types of closeout errors had no impact on the overall billing/performance error rate because they incorrectly coded where in the SBC network the fault was corrected.

Usually jumpers opened and laid back on the Main Distributing Frame (MDF) in the Central Office.

Accordingly, with the exception of Situation # 1 the root cause for incorrect close out codes was repair technician error, either in the field, the central office or by the LOC Maintenance Administrators (MAs).

### 4. Actions

The internal improvement plan proposed by SBC in its October 30, 2002 filing was constructed to address the accuracy of trouble ticket closure coding for special service and UNE repairs. The plan included many of the steps identified in the proposed compliance plan.

The MPSC in its January 13 Order directed that the repair coding accuracy improvement issue be addressed via a compliance plan so that an independent third party can verify the results achieved. It also directed SBC to include evaluation criteria by which the third party could measure whether the corrective actions resulted in improved coding accuracy. In its comments, AT&T stated that the MPSC should require SBC to address this coding issue and stated that incorrect coding could lead to incorrect performance measurement results reporting. Further, AT&T was concerned that under SBC's proposed Improvement Plan, the original source information would not be available for review. AT&T also questioned the relationship between SBC's proposed monthly quality reviews and improved accuracy and completeness of closeout coding. SBC has addressed the requirements of the MPSC and the comments of AT&T in the following enhanced plan.

The following activities identify the steps that SBC has taken or plans to take to improve the accuracy and completeness of trouble ticket closure coding for special service and UNE repairs.

### **Documentation Updates include:**

- The SBC document that is used as a reference for Cause Codes was updated to clarify use of Cause Code 600 in late June 2002. Cause Code 600 is used to identify those situations where SBC is unable to determine what caused a particular case of trouble. This documentation gap was identified via a number of cited trouble tickets for both Special Service and UNE circuits. The updates to the documentation provided a clearer description of the process currently followed by SBC technicians and addressed questions raised by BearingPoint. The updated SBC document was provided to BearingPoint for review on August 1, 2002.
- Local Operations Center (LOC) Job Aid JA-27B has been updated to reflect additional steps for Maintenance Administrators (MAs) to take that will improve coding accuracy when a mechanized loop test (MLT) indicates "Open Out".

<sup>&</sup>lt;sup>4</sup> See AT&T's comments filed 11/15/02, Connolly affidavit at pp. 35-36, paras 80-83.

<sup>&</sup>lt;sup>5</sup> "Open out" condition on a MLT means a circuit trouble is testing beyond the SBC Central Office.

following a circuit retest. All MAs and managing supervisors responsible for the accurate coding of closed trouble tickets in the LOC were covered on this process enhancement between August 1 and August 9, 2002.

- SBC updated the internal Methods and Procedures (M&P) documentation (SBC 660-169-013) used to define accurate disposition coding of trouble tickets to include new disposition codes and to clarify the use of existing disposition codes. Updates to the M&P were completed on August 16, 2002. These updates also generated the following outputs:
  - Installation and Repair (I&R) internal Job Aids (JA 170 August 20 & JA 43 August 30, 2002) were updated to reflect the M&P changes/clarifications.
    - Awareness sessions were conducted 8/23/02 thru 11/05/02 to review updated procedures.
  - o A LOC "Flash" (02RC49) was issued 8/26/02 to reflect the new disposition codes.
  - o The Customer Service Bureau (CSB) Handbook was updated 8/26/02 to reflect the new disposition codes.
    - A CSB "Flash" was issued to notify CSB personnel of updated handbook procedures.
- December 16, 2002 Central Office Technician method and procedure documentation (SBC 002-216-298) was issued for trouble ticket coding in central offices (COs). The new coding process has also been incorporated into the "Frame Management Plan", which is an ongoing quality control measure utilized by the Central Office management.

#### **Training Review Sessions Include:**

• SBC conducted training review sessions (aka awareness sessions) to reinforce current procedures used for the close out of Cable Multiple tickets when wholesale account trouble tickets are attached to the lead cable trouble ticket number. Sessions covering all Installation and Repair (I&R) Operations Center personnel were completed by August 13, 2002. A "Cable Multiple" ticket number is assigned to a damaged cable or cable failure that potentially impacts service to multiple subscribers served by the same cable. Individual subscriber (or CLEC) reports of service interruptions having individually assigned trouble ticket numbers may become attached to the lead or Multiple Cable Trouble Ticket Number (CTTN). SBC was made aware that in at least two audited instances, individual wholesale trouble reports attached to a Cable Trouble Ticket Number were closed as the CTTN closed and were not "detached" and tested to confirm restoration of the reported trouble. Reinforcement of current procedures to detach individual case trouble tickets from the CTTN and retest with the CLEC was

- completed for I & R Operations Center employees through Awareness Sessions conducted between August 8 and August 15, 2002.
- SBC conducted awareness sessions to reinforce current procedures used for the disposition coding of trouble reports closed when multiple faults are found on the same telephone line.
  - Sessions covering all Installation and Repair (I&R) field technicians were completed by August 12, 2002.
  - Additional training sessions with I&R personnel were conducted in November 2002.
- Additional review sessions for LOC personnel were conducted to reinforce accurate trouble closure procedures were completed by November 10, 2002.
- Review training sessions were conducted with Special Service Center personnel to reinforce correct trouble ticket coding procedures. These review sessions were completed by November 25, 2002.
- Review sessions were conducted through January 31, 2003 with all SBC Midwest Central Office technicians to review the newly created Methods and Procedures for trouble ticket coding.
- On February 10, 2003 the LOC began to conduct workshops to review closure codes and appropriate usage of these codes. These workshops will continue until the desired level of accuracy is achieved.
- On February 3, 2003, LOC associates were provided visual aids to identify commonly made coding errors and the recommended corrective actions.

#### **Management Review Activities**

- On October 30, 2002, LOC management initiated monthly reviews of coding accuracy on all employee trouble tickets closures.
- In December 2002, LOC management initiated bi-monthly random reviews of trouble ticket closures. The results of these reviews will be tracked and reported via an internal intranet tracking mechanism.
- On February 10, 2003, LOC management initiated a "Ticket Closure Approval Team" for Resale/UNE-P trouble tickets. Each LOC MA will be required to receive approval prior to closing a trouble ticket until a 95% accuracy rate is achieved
- To monitor the accuracy and completeness of trouble ticket coding, the trouble ticket coding review has been incorporated into the regularly scheduled quality control measures utilized by the Special Services management. This effort began December 2002.

• I&R management will use the current auditing processes to review the efficacy of the above-cited measures and identify corrective action when required to improve trouble ticket coding accuracy for Special Service and UNE circuit trouble reports.

SBC acknowledges that the "original source information" as noted by AT&T<sup>6</sup> is not available in the above-cited improvement measures. However, SBC believes that these measures will improve the accuracy of trouble ticket coding based on the types of errors noted by BearingPoint in the test. This improvement will be demonstrated through the Third Party Compliance evaluation.

The following provides the timelines and current status of each of the items contained in the actions noted above:

See AT&T's comments filed 11/15/02, Connolly affidavit at pp. 35-36, paras 80-83

## **Repair Coding Accuracy Compliance Plan**

	Task	Begin	End	Status
1.	Update documentation for Cause Code 600	6/01//02	06/30/02	Completed
2.	Update LOC Job Aid JA-27B	07/31/02	08/01/02	Completed
	A. Conduct Job Aid Training	08/01/02	08/09/02	Completed
3.	Develop "awareness" training and conduct sessions with Installation & Repair Operations Center personnel to review procedures for "Cable Multiple" trouble tickets	08/01/02	08/08/02	Completed
	A. Conduct "Awareness" sessions	08/08/02	08/15/02	Completed
4.	Develop awareness training for I&R personnel to reinforce coding of trouble tickets when multiple faults are on the same line  A. Conduct awareness sessions	8/10/02 08/11/02	08/11/02 08/12/02	Completed Completed
5.	Update Methods and Procedures to include two new disposition codes and clarifications of existing codes.  A. I&R internal job aids were updated to reflect M&P changes/clarification  B. Conduct I&R awareness sessions to review updated job aids  C. Issue LOC "Flash" to advise of new disposition codes	08/20/02 08/23/02 08/26/02	08/30/02 11/5/02 08/26/02	Completed Completed Completed
	E. Issue CSB "Flash" to advise of handbook updates with new disposition codes	08/26/02	08/26/02	Completed
6.	LOC management initiates "Ticket Closure Approval Team"	02/10/03		Ongoing
7.	LOC will initiate ongoing workshops to review proper coding procedures	2/10/03		Ongoing
8.	Conduct LOC monthly reviews on all employee trouble ticket closures	10/30/02		Ongoing
9.	LOC management will conduct bi-monthly random reviews of trouble ticket closures	12/01/02		Ongoing
10.	Update Central Office M&P for trouble ticket closure  A. Conduct review sessions with Central Office	12/16/02	12/16/02	Completed
	technicians  B. Incorporate trouble ticket coding reviews into the	12/17/02	01/31/03	Completed
	"Frame Management Plan"	01/01/03		Ongoing
11.	Conduct review training sessions with Special Service Center personnel	11/20/02	11/25/02	Completed

#### **Repair Coding Accuracy Compliance Plan**

Task	Begin	End	Status
12. Incorporate quality reviews of trouble tickets into current Special Service Center quality control measures	12/01/02		Ongoing
<ol> <li>Incorporate quality reviews of trouble tickets into current I&amp;R quality control measures</li> </ol>	12/01/02		Ongoing

# 5. Third Party Examination Approach

Since training and awareness sessions have been completed, after an appropriate period of internal monitoring and review as set by SBC, the accuracy and completeness of closure codes for special services and UNE repairs is expected to improve when compared to BearingPoint's test results of 82.1% for special services and 84.8% for UNE. SBC's target is 95% accuracy for UNE trouble ticket coding and 90 % for Special Service Circuit trouble ticket coding. If the third party evaluation does not show the target has been achieved, any further required actions will be determined by the MPSC and SBC. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include the following:

- The third party will review coding accuracy and completeness by comparing the trouble ticket coding applied to actual troubles found using a sample from commercial production. The sample design and the evaluation methodology will be reviewed with MPSC staff prior to its implementation
- The third party will affirm SBC's implementation of the actions described in this compliance plan by reviewing documents, conducting interviews, and performing site visits. This evaluation will include a review of SBC's self-audit results.



# MPSC Case No. U-12320

# **Draft Improvement Plan**

for

**Line Loss Notifier Communication** 

**February 13, 2003** 

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# 1. Purpose

The purpose of this draft improvement plan is to describe action Michigan Bell Telephone Company ("SBC") has taken and will take to improve communications regarding line loss noticers ("LLNs"). This improvement plan was first filed on October 30, 2002 ("October 30 Compliance Filing"). Pursuant to the Michigan Public Service Commission's ("MPSC's") Order issued January 13, 2003 ("January 13 Order"), in Case No. U-12320 (SBC's §271 Checklist Compliance Docket), the plan has been revised to address the specific issues identified in the January 13 Order regarding the communication between SBC and CLECs regarding operational concerns with LLNs. Specifically, this plan details the accessible letter process that will be used when SBC determines that an interruption of LLNs could affect more than one CLEC. It also describes the monthly report that SBC proposes to provide to the MPSC for at least six months. SBC recognizes that further modifications to this plan may be appropriate based on the collaborative session scheduled for March 4 – 5, 2003. As a result, SBC will submit a modified improvement plan to the MPSC by March 13, 2003.

#### 2. Issue

1

BearingPoint Consulting (f/k/a KPMG Consulting) performed testing of line loss notification as part of the Third-Party Operations Support Systems ("OSS") testing. Two types of tests were performed: one using Test CLEC transactions that tested the entire line loss process and transaction flow (Line Loss Timeliness), and a second test using a large sample of production orders to further confirm the logic used by SBC to generate line loss notifications (Line Loss Accuracy). Both of these tests initially resulted in the issuance of Exceptions (74 and 94), however each test was concluded satisfactorily through subsequent retesting by BearingPoint.

In its October 14, 2002 Disposition Report for Exception 74 regarding Test CLEC line loss testing, BearingPoint reported that, based on their testing associated with that Exception and the resulting 96.2% success rate, "the issues identified in this Exception Report have been addressed." This finding, coupled with BearingPoint's test results associated with Exception 94 for Line Loss Accuracy testing, confirm that the process improvements implemented by SBC during the period of the OSS Evaluation had the intended result, i.e., a reliable process for delivery of line loss notifications to CLECs.

As a result of discussion with its CLEC customers, however, SBC determined that improvements in communication of status of the line loss notifier process could still be made. Consequently, in its October 30 Compliance Filing, SBC proposed a plan to improve that communication; the plan was based on discussions during the technical workshops held on October 14 - 18, 2003. Based on subsequent CLEC comments

This plan does not address any additional changes to Performance Measure MI 13. Modification to PM MI 13 are included with the January 17, 2003 filing to the Commission of performance measure modifications resulting from the collaborative six-month review.

#### **Draft Improvement Plan For Line Loss Notifier Communication**

regarding that plan and the MPSC's direction in its January 13 Order, SBC has enhanced that plan.

#### 3. Actions

#### A. LLN Accessible Letters

In its October 30 Compliance Plan filing, SBC proposed an improvement plan for line loss notifiers that proposed improvements in communications from SBC to CLECs should future incidents occur related to the delivery of line loss notifiers. The improvement in communication was based on the issuance of Accessible Letters ("ALs") to provide pertinent information to CLECs in a timely manner.

SBC implemented enhanced communication procedures in November 2002. The attached Accessible Letter, CLECAMS02-122 issued November 12, 2002, is the single example at this time of an initial notification to CLECs of a line loss notifier interruption. Also attached is CLECAMS02-123 issued November 13, 2002, which was issued to provide follow-up information regarding the same incident. This follow-up AL provided further information regarding the interruption as soon as it was available to SBC.

In response to the January 13 Order and the comments of CLECs regarding the initial version of the plan, SBC will provide the following information to CLECs regarding line loss notice interruptions that could affect more than one CLEC:

- Within one business day of determining that an interruption of line loss notification issuance that could affect more than one CLEC has occurred<sup>2</sup>, SBC will issue an Accessible Letter ("AL") to affected CLECs. The AL will include any available details concerning the cause, scope and duration of the interruption.
- Immediately following issuance of the AL, SBC will contact affected CLECs directly using the currently-designated customer contact maintained by the SBC OSS Support organization.
- As soon as such information can be determined and confirmed, SBC will issue follow-up ALs to affected CLECs.
- If SBC changes its line loss notifier procedures, it shall immediately provide appropriate notification.

#### **B.** Monthly Reporting to the MPSC

• SBC will provide monthly reports to the MPSC regarding line loss issues for a minimum period of six months, beginning with reporting for the calendar month of

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See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 33, ¶ 75, regarding how SBC will determine which outages will be reported. The MPSC Order notes that these accessible letters should be sent "within 24 hours of determining that an interruption of line loss notification issuance has occurred .." This plan proposes that such letter be sent within one business day to conform to SBC's operational schedule.

#### **Draft Improvement Plan For Line Loss Notifier Communication**

January 2003. The reports will be due by the 15th day of the following month. This report will include information regarding line loss issues that have developed during the month; their cause, duration, scope of loss notifiers affected, number of CLECs affected, and actions taken to address the issues. SBC will use a broad definition of line loss issues when determining what should be included in the report.

• A sample of the proposed monthly report is included as an attachment to this plan. The format of this report may change based on the March 4 collaborative session.

# 4. Status Reporting

SBC will report line loss issues monthly to the MPSC for a minimum of six months.



#### Accessible

Date: November 12, 2002 Number: CLECAMS02-122

Effective Date: NA Category: OSS

Subject: Line Loss Notification Process Errors and Interruption 11/1102 Through 11/13/02

Related Letters: NA Attachment: No

States Impacted: Ameritech Region

Response Deadline: NA Contact: Account Manager

Conference Call/Meeting: NA

Two issues affecting the Conversion Date (CVD) on Line Loss Notifications (LLNs) have been identified. This is to communicate information about the issues and recovery plans.

As a result of the software release implemented November 9, 2002, errors have been noted on EDI 836 LLNs sent to the few customers using the EDI version 5.02. Customers who receive LLNs via LEX or FAX are not impacted.

Version 5.02 is the newest EDI version and the one implemented with the release this past weekend. All SBC states are affected. Facts are as follows:

- Incorrect formatting has caused the CVD to not be accurate on LLNs sent November 11 and the morning of November 12 only. The data in this field should not be relied on. A correction is being tested and planned to be implemented the evening of November 13, 2002.
- Since the information on the LLNs sent November 11 and the morning of November 12 is not totally usable, the LLNs for those customers who receive them in EDI version 5.02 will be held until the correction is deployed.
- Following that, all LLNs from November 11 and 12 for those affected customers will be regenerated and re-sent, and LLNs that were held will be distributed.

A second issue has been detected affecting LLNs sent to customers using version 4.02 of EDI in Ameritech. Facts known at this time regarding this issue are as follows:

- Some LLNs sent since November 11 have not contained information in the CVD field.
- Root cause has not been determined and will be communicated in a subsequent letter.
- All data necessary to regenerate these LLNs is available and these LLNs will be regenerated.

LLNs either held or redistributed will be reflected as late in performance results.

Affected customers may direct their questions to their Account Managers. Coordination of re-flow efforts can be arranged.







#### Accessible

Date: November 13, 2002 Number: CLECAMS02-123

Effective Date: NA Category: OSS

Subject: Follow-up to Line Loss Notification Process Errors and Interruption 11/11/02 Through

11/13/02

Related Letters: CLECAMS02-122 Attachment: No

States Impacted: Ameritech Region

Response Deadline: NA Contact: Account Manager

Conference Call/Meeting: NA

This letter supplements Accessible Letter **CLECAMS02-122** dated November 12, 2002 and provides final details regarding the Line Loss Notification Process errors and interruption. Corrections have been made for both issues and Line Loss Notifications (LLNs) are being processed normally.

Both issues identified in **CLECAMSO2-122** were caused by EDI mapping errors that resulted from the expansion of the length of the ECCKT field in version 5.02. Program updates mishandled the field length change, which resulted in the Conversion Date (CVD) information not being picked up by the EDI formatter.

This error affected all LLNs sent to customers using EDI version 5.02. It also affected LLNs sent in version 4.02 in the Ameritech region when the loss was to SBC Retail or a CLEC using version 5.01 or 5.02. Corrections were put in place last night, November 12. LLNs that were being held so that they were not distributed with errors have been released. LLNs that were sent with no CVD can be regenerated and SBC will coordinate the delivery of those LLNs with the affected customers.

SBC apologizes for these errors. Affected customers may direct questions to their Account Managers.

# MPSC Case No. U-12320 Line Loss Notification Interruption Report Data as of January 2003



CLEC Name	Date of Occurrence	Brief Description of "Loss" Event	Date Loss Restored to Customer	Accessible Ltr Number	Accessible Ltr Distribution Date	Single CLEC occurrences not requiring AL
		A A ADI				
		AIVIPI				



# MPSC Case No. U-12320

# **Draft Improvement Plan**

for

**Pre-Order Processing Timeliness** 

**February 13, 2003** 

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# 1. Purpose

The purpose of this draft improvement plan is to describe actions Michigan Bell Telephone Company ("SBC") has taken and plans to take to improve pre-order processing timeliness. This improvement plan, first filed on October 30, 2002 ("October 30 Compliance Filing"). Pursuant to the Michigan Public Service Commission's ("MPSC's") Order issued on January 13, 2003 ("January 13 Order") in Case No. U 12320 ("SBC's §271 Checklist Compliance Docket), the plan has been revised to address the specific issues identified in the January 13 Order regarding pre-order transaction protocol conversion (i.e., EDI translation) timeliness. Specifically the January 13 Order required that SBC's filing include: validation that recent changes to its pre-order EDI translator software resulted in a decrease in translator processing time; details of any further improvement plans in this area; and the status regarding Performance Measurement 2 relating to protocol conversion time. SBC recognizes that further modifications to this plan may be appropriate based on the collaborative session scheduled for March 4-5, 2003. As a result, SBC will submit a modified improvement plan to the MPSC by March 13, 2003.

### 2. Issue Definition

BearingPoint (f/k/a KPMG Consulting) performed a Pre-Order, Order and Provisioning Volume Test as part of the Third-Party Operations Support Systems ("OSS") testing. Following each of the multiple iterations of that testing, BearingPoint issued various Observations and Exceptions regarding the results. These Observations and Exceptions were consolidated into Exception 112.

During the course of volume testing, SBC made system enhancements addressing the functional issues and timing issues identified by BearingPoint. These enhancements were retested by BearingPoint in subsequent volume test iterations. BearingPoint's most recent analysis has confirmed that there are presently no unsatisfied determinations for the functionality evaluation criteria, and few issues with timeliness.

The timeliness of the EDI pre-order interface was the issue most consistently cited by BearingPoint during the course of its volume testing. Of the failed test points resulting from volume testing identified by BearingPoint in its report on the OSS Evaluation,

virtually all are associated with pre-order transaction timeliness, and more with the timeliness of the EDI pre-order interface than with the CORBA or GUI interface<sup>1</sup>.

Based on then-current performance results, and taking into consideration the significant shift and trend by CLECs to use the CORBA and Verigate interfaces rather than the EDI interface for pre-order inquiries, SBC believes its EDI pre-order performance satisfactory. However, in response to the interest of parties to this OSS evaluation, SBC has continued to examine alternatives to improve EDI pre-order timeliness.

#### 3. Actions

#### A. Pre-order EDI translator improvement results.

In its October 30 Compliance Plan filing, SBC proposed an improvement plan for preorder timeliness. That plan described a configuration change that had been made to SBC's pre-order EDI translator and the expected performance improvement from same, intended future translator software evaluations, and potential system upgrades.

During 3Q02, SBC and Sterling Commerce worked to determine whether it was possible to improve the performance of its Gentran EDI translation software. After initially concluding that no such performance improvement was possible, a custom modification to the software configuration was attempted. This custom modification effectively reduced the amount of system processing performed on each transaction. Testing confirmed the performance improvement and that there was no detrimental impact on process functionality. This software configuration change was then made to the production EDI translator on September 11, 2002<sup>2</sup>.

BearingPoint's Pre-Order, Order, and Provisioning volume test consisted of forty-four test points. Thirty-three of these test points were considered as satisfied in the October 30 OSS Evaluation report. The test points not satisfied included timeliness of five individual EDI pre-order transaction types, timeliness of two individual GUI pre-order transaction types, timeliness of two individual CORBA pre-order transaction types, appropriateness of responses to GUI pre-order transactions, and timeliness of order reject transactions.

See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 34, ¶ 77, questioning whether SBC had actually placed the modified translator configuration into production.

Data collected by SBC for monitoring EDI translator performance shows a significant improvement as a result of this September 11 software configuration change. This data is included as Attachment 1<sup>3</sup>. The average protocol translation time improved from 1.4 seconds inbound and 1.7 seconds outbound prior to the translator configuration change to .36 seconds inbound and .73 seconds outbound after the change.

#### B. Pending Pre-order EDI translator improvement

Further, SBC will upgrade the existing SBC commercial EDI translator to the most recent version of software, Gentran:Server 6.0, in 2Q2003. The configuration change, as outlined above, will be carried over to this upgraded version<sup>4</sup>.

Sterling Commerce released a completely new version of their EDI translator software in late 2002. This new version is referred to as Sterling Integrator. SBC is evaluating this new translator software, and considering implementation of the software.

During October 2002, the SBC EDI group examined the technical documentation, viewed product demonstrations, and held discussions with the Sterling Integrator development team. While there are a number of new application management features in the Integrator product, no obvious performance enhancements over the translator software configuration presently in use by SBC could be identified.

Subsequently, SBC's translator operating environment was replicated for Sterling so that they could perform comparison measurements in their labs<sup>5</sup>. The Sterling technical teams have not yet been able to suggest any improvements in SBC's current mode of operations or offer evidence that the Integrator software would have performance benefits.

The following table provides the schedule for the actions discussed in this section:

MPSC January 13 Opinion and Order, pg. 5, requiring that SBC provide information to validate that the September 11, 2002 configuration change produced a decrease in translator processing time.

See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 34, ¶ 77, questioning whether the 2003 software upgrade is compatible with other software in the translator configuration.

See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 34, ¶ 77, questioning whether SBC had ordered the software upgrade.

Task	Begin	End	Status
1. Implement translator configuration change.	9/11/02	9/11/02	Completed
2. Upgrade EDI translator to latest available version (Gentran:Server 6.0)	02/03/03	6/30/02	In progress
A. Install Gentran:Server 6.0 on test server			Completed
B. Upgrade operating system version on production translator	02/03/03	Ongoing	In progress
C. Install Gentran:Server 6.0 on production translator	02/03/03	Ongoing	In progress
3. Evaluate performance of Sterling Integrator	12/15/02	Ongoing	In progress

#### C. Status of Performance Measure 2

As a means to monitor the future performance of the pre-order EDI translator, SBC has jointly proposed with CLECs an immediate clarification and amendment to Performance Measure 2, Pre-Order Transaction Timeliness. In this clarification, the measurement of protocol conversion time is clearly defined. This modification to PM 2 is included with the January 17, 2003 filing to the Commission of performance measure modifications resulting from the collaborative six-month review. A copy of the proposed modified PM2 is included as Attachment 2. The business rules now clearly define when and where the time stamps are to be taken for protocol translations and for the requested pre-order function. In addition a separate benchmark has been added for protocol translation for EDI, CORBA and WebVerigate.

Protocol Translation Time – EDI (input and output)	95% in <= 4 seconds
Protocol Translation Time – CORBA (input and output)	95% in <= 1 seconds

Protocol Translation Time – WebVerigate (input and	95% in <= 1 second diagnostic
output)	

# 4. Status Reporting

SBC will provide a report regarding its progress on pending re-order EDI translator improvement discussed in Section 3(b) above to the Commission for its review in July 2003 and quarterly thereafter, if needed. SBC will continue to report protocol translation times in accordance with the terms of PM 2.

# **EDI Protocol translation Time (Pre-Order)**

SENDER EDI	LOG_DATE 20020901 20020903 20020904 20020905 20020906 20020907 20020909 20020910 20020911	IN_AVG 0.976 1.451 1.514 1.474 1.469 1.346 1.472 1.497	OUT_AVG 1.748 1.617 1.665 1.658 1.603 1.445 1.646 1.62 1.672	TRANS_COUNT 1 1207 1164 775 751 20 1051 900 759	IN_SEC_TOT	1.748 1951.839 1937.84 1285.139 1203.565 28.907 1729.577 1458.101
Totals				6628	9800.029	
				Avg IN =	1.478580115	
				Avg OUT=		1.639388202
EDI	00000040	0.044	0.500	04.4	070.047	400,400
EDI EDI	20020912	0.344	0.569	814	279.847	463.402
EDI	20020913 20020914	0.342 0.347	0.549 0.671	982 47	335.503 16.3	539.067 31.537
EDI	20020914	0.353	0.759	36	12.691	27.34
EDI	20020916	0.361	0.733	2081	751.99	
EDI	20020917	0.383	0.706	1910	731.324	1347.946
EDI	20020918	0.347	0.749	2030	704.384	1520.846
EDI	20020919	0.349	0.717	1849	645.167	1325.398
EDI	20020920	0.345	0.738	1780	613.31	1312.95
EDI	20020921	0.349	0.61	68	23.726	41.507
EDI	20020922	0.372	0.613	35	13.02	21.441
EDI	20020923	0.343	0.692	2350	806.808	1626.588
EDI	20020924	0.359	0.782	3000	1078.345	
EDI	20020925	0.347	0.749	2053	712.898	1538.3
EDI	20020926	0.383	0.796	1956	748.237	1556.162
EDI	20020927	0.385	0.773	1829	703.929	1413.058
EDI	20020928	0.391	0.72	92	35.983	
EDI	20020929	0.544	0.844	24	13.047	
EDI	20020930	0.385	0.779	2965	1140.448	
Totals				25901	9366.957	
				Avg IN = Avg OUT=	0.361644608	0.731606424
				Avg Ou I =		0.731000424

This table shows the time required for processing transactions through SBC Midwest's pre-order EDI translator. All LSOG 5 EDI pre-order transactions for the region are included.

Information is compiled from raw data captured from the EDI translator and has not been modified to be consistent with the expected reporting of this information

Dates are in the format of YYYYMMDD, times are in seconds.

Appendix 2 – Proposed Performance Measure 2

#### 2. Percent Responses Received within "X" seconds – OSS Interfaces

#### **Definition:**

The percent of responses completed in "x" seconds for pre-order interfaces (WebVerigate, EDI and CORBA) by function.

#### **Exclusions:**

None

#### **Business Rules:**

Timestamps for the interfaces (WebVerigate, EDI and CORBA) are taken at the SBC Pre-Order Adapter and do not include transmission time through the xRAF or protocol translation times. The clock starts on the date/time when the query is received by the SBC Pre-Order Adapter and stops at the date/time the SBC Pre-Order Adapter passes the response back to the interfacing application (WebVerigate, EDI pre-order or CORBA). The response time is measured only within the published hours of interface availability as posted on the CLEC On-line website.

https://clec.sbc.com/clec/hb/filelist/docs/011030-012759/OSS Hours of Operation.xls

For the protocol translation response times, interface input times start at the time the interface receives the pre-order query request from the CLEC and the end time is when the connection is made to the SBC Pre-Order Adapter for processing. Interface output times start when the interface receives the response message back from SBC Pre-Order Adapter and the end time is when the message is sent to the CLEC.

If the CLEC accesses SBC systems using a Service Bureau Provider, the measurement of SBC's performance does not include Service Bureau Provider processing, availability or response time.

Appendix 2 – Proposed Performance Measure 2

#### **Levels of Disaggregation:**

- Address Verification
- Telephone Number Assignment (includes inquiry, reservation, confirmation and cancellation transactions)
- Customer Service Inquiry (CSI) < = 30 WTNs (Also broken down for Lines as required for DIDs).
- Customer Service Inquiry (CSI) > 30 WTNs/lines
- Service Availability
- Service Appointment Scheduling (Due Date)
- Dispatch Required
- PIC
- Actual Loop Makeup Information requested
- Design Loop Makeup Information requested (includes Pre-Qual transactions)
- Protocol translation time EDI (includes input and output times)
- Protocol translation time CORBA (includes input and output times)
- Protocol translation time WebVerigate (includes input and output times)

Calculation:	Report Structure:
(# of responses within each time	Reported for a CLEC, all CLECs, and SBC
interval ÷ total responses) * 100	affiliate where applicable (or SBC acting
	on behalf of its' affiliate), by interface.

#### **Measurement Type:**

	${f IL}$	IN	MI	OH	$\mathbf{WI}$
Tier 1	Low	Low	Med	Low	Low
Tier 2	Med	Med	Med	Med	Med

#### Benchmark:

No damages will apply to the Protocol Translation Times for WebVerigate. No damages apply to the disaggregation for CSIs with greater than 30 WTNs/lines. Critical z-value does not apply.

Measurement	WebVerigate, EDI and CORBA
Address Verification	95% in <= 10 seconds
Telephone Number Assignment (includes inquiry, reservation, confirmation and cancellation transactions)  Customer Service Inquiry < or = 30 WTNs/lines	95% in <= 10 seconds  95% in <= 15 seconds
Customer Service Inquiry > 30 WTNs/lines	95% in <= 60 seconds diagnostic

### DISCUSSION DRAFT - 2/6/03

# **Draft Improvement Plan For Pre-Order Processing Improvements** Appendix 2 – Proposed Performance Measure 2

Service Availability	95% in <= 13 seconds
Service Appointment Scheduling (Due Date)	95% in <= 5 seconds
Dispatch Required	95% in <= 19 seconds
PIC	95% in <= 25 seconds
Actual Loop Makeup Information requested (5 or less loops searched)	95% in <= 30 seconds
Actual Loop Makeup Information requested (greater than 5 loops searched)	95% in <= 60 seconds
Design Loop Makeup Information requested (includes Pre-Qual transactions)	95% in <= 15 seconds
Protocol Translation Time – EDI (input and output)	95% in <= 4 seconds
Protocol Translation Time – CORBA (input and output)	95% in <= 1 seconds
Protocol Translation Time – WebVerigate (input and output)	95% in <= 1 second diagnostic



# **Draft Improvement Plan**

# For

**Change Management Communications** 

**February 13, 2003** 

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#### 1. Purpose

The purpose of this draft improvement plan is to describe the actions Michigan Bell Telephone Company ("SBC") proposes to take to improve change management communications consistent with Michigan Public Service Commission ("MPSC") Opinion and Order dated January 13, 2003 ("January 13 Order") in Case No. U-12320 ("SBC's §271 Checklist Compliance Docket). The January 13 Order stated that certain recent OSS changes were implemented without prior announcement and did negatively affect CLECs and required SBC to include a compliance and/or improvement plan to address the issue. The change management communications improvement plan includes process updates and quality assurance efforts that will be implemented and monitored by SBC. SBC recognizes that further modifications to this plan may be appropriate based on the collaborative session scheduled for March 4-5, 2003. As a result, SBC will submit a modified improvement plan to the MPSC by March 13, 2003.

#### 2. Issue Definition

SBC has developed, in collaboration with CLECs, and implemented a uniform change management process – the 13 State Change Management Process ("13-State CMP") pursuant to the FCC's required Uniform and Enhanced Plan of Record ("POR"). The MPSC concluded in its report on SBC's §271 Application that "SBC's 13-State CMP complies with the FCC's requirements and that the testing [performed by an independent third party auditor BearingPoint (formerly KPMG Consulting LLP)] indicates SBC's compliance with that process". (January 13 Order, p.10)

However, the MPSC did determine that certain recent OSS changes were implemented without prior announcement and did negatively affect CLECs. The MPSC further determined that "[al] though . . . SBC did comply with the letter of its change management process . . . a more encompassing definition of items covered . . . is necessary". (January 13 Order, p. 10) With this improvement plan, SBC proposes changes to its procedures regarding notification of OSS modifications responsive to CLEC feedback 1 and the MPSC's requirements.

See: AT&T Comments filed 11/15/02, Willard-Webber affidavit, pp. 35-37, ¶¶ 69-73; and, AT&T Comments filed on 12/19/02. DeYoung affidavit, pp. 23-32, ¶¶ 49-71.

Pursuant to the Federal Communication Commission's ("FCC's") SBC/Ameritech Merger Condition 8, SBC developed and offered to the state commissions a uniform change management process – 13 State CMP. It was developed with significant Competitive Local Exchange Carriers ("CLEC") collaboration and negotiations. SBC implemented the 13-State CMP process in early 2001. This CMP was also reflected in the *Joint Report of the Participants Regarding Resolved OSS Enhancements And Process Improvements*, filed by the collaborative participants in this proceeding on December 27, 2000.

BearingPoint conducted an exhaustive and comprehensive test of SBC's change management methods and procedures. BearingPoint found that the 13-State CMP being used by SBC provides for input from interested parties and contains clearly defined and reasonable intervals for notifying CLECs about proposed changes. BearingPoint also found that the 13-State CMP is clearly defined and documented and that related documents are accessible via CLEC OnLine. Finally, as part of the assessment of the 13-State CMP documentation, BearingPoint reviewed detailed procedures for dispute resolution.

The 13-State CMP provides guidelines for the management of changes to the OSS interfaces provided by SBC and used by CLECs in the various SBC operating regions. For example, the 13-State CMP specifies timelines to guide the development and publishing by SBC of interface specifications for periodic, scheduled "releases", or enhanced versions of the interfaces.

In addition, in order that parties may manage the modifications required between releases, the 13-State CMP provides a process for notification of these changes referred to as the Exception process. A notification to CLECs is required under the Exception process whenever a change to be implemented by SBC will have an impact on CLECs using the interface due to a change in interface business rules that occurs outside of the quarterly release requirements Accessible Letters. In a specific instance described by AT&T and noted by the MPSC, SBC did not issue an Exception notification of a planned change generally due to SBC's belief there would be no impact on CLECs.

This 13-State CMP improvement plan will facilitate communicating system changes that occur between releases and, more specifically, for the types of changes that were the basis for the comments filed by AT&T and noted by the MPSC.

The following changes made to SBC Midwest's OSS were implemented without announcement to the CLEC community, and were the basis for the AT&T comments:

- Error G408 (a. Invalid Trailing Data for Call Forward Busy No Answer Feature and b. Pay Per Use blocking and Custom ring feature)<sup>2</sup>
- Error L100/L101 (PIC/LPIC Change)<sup>3</sup>
- Error B103 (Additional Directory Listings issue for non-published accounts)<sup>4</sup>
- Error H325 (More Telephone Numbers than on Account)<sup>5</sup>

#### 3. Root Cause Analysis

At the time that each of the above errors occurred, SBC conducted an analysis to determine the cause. Only one of the above changes, L100/101 PIC/LPIC, should have followed the Exception Process as noted in the 13-State CMP. The Exception Process is invoked only in those situations where SBC needs CLEC approval to modify an existing documented business rule outside of the normal notification timelines. In such a situation, SBC would distribute an Accessible Letter ("AL"), detailing the issue and requesting CLEC concurrence with the change/modification. For the L100/101 PIC/LPIC error, SBC applied an LSOG 5 edit in the LSOG 4 version in an attempt to correct an open defect request ("DR"). Since the business rule was changed for version 4.02, based on the Exception Process requirements, an Exception Request AL should have been distributed to CLECs. SBC is taking corrective actions to minimize the chance of this type of mistake reoccurring, as explained below.

In the case of the other examples, the Exception Process did not apply based on the 13-State CMP. In the case of both G408 and B103 errors, SBC was not *changing* any rules, but either *creating an edit to enforce an existing rule*, or further *tightening an edit of an existing business rule*. In those cases, SBC acknowledges that notifying CLECs of these modifications is beneficial and will institute procedures to send courtesy Accessible Letters to alert CLECs of these changes.

<sup>&</sup>lt;sup>2</sup> AT&T Comments filed 11/15/02, Willard & Webber, pp. 35-37, ¶¶ 69-73; AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 23-26, ¶¶ 49-58

<sup>&</sup>lt;sup>3</sup> AT&T Comments filed on 12/19/02. DeYoung affidavit, pp. 27-31, ¶¶ 59-67

<sup>&</sup>lt;sup>4</sup> AT&T Comments filed on 12/19/02. DeYoung affidavit, p. 32, ¶¶ 70-71

<sup>&</sup>lt;sup>5</sup> AT&T Comments filed on 12/19/02. DeYoung affidavit, pp. 31-32, ¶¶ 68-69

Additionally, SBC recognizes that CLECs may appreciate additional information about SBC's third party vendors and software being used by SBC Midwest. SBC will provide these details to the CLEC community to further augment current communication and understanding of SBC Midwest OSS that may impact CLECs.

#### 4. Actions

SBC is committed to implementing the following action plans. The actions listed below are in addition to the existing notification and communication process within the 13-State CMP.

#### a. Additional Information to be Provided by SBC to CLECs

- SBC will notify the CLEC community via courtesy Accessible Letters ("courtesy AL") when changes to OSS are made that may reasonably be expected to be CLEC-impacting. Courtesy ALs will be communicated when the following change scenarios are implemented.
  - 1. CLECs would be notified with a courtesy Accessible Letter in situations where SBC is *tightening an edit or business rule*. SBC would include this type of change in a quarterly release if possible, but will evaluate each issue on a case-by-case basis. In situations where the change will occur outside a quarterly release (i.e., edit is part of a fix for an open DR), SBC intends to notify CLECs of the change through a courtesy AL. Notification of changes included in quarterly releases will continue to be provided in the Initial and Final Requirements Accessible Letters. Procedures to issue courtesy ALs will be developed and implemented. A specific example of this type of change is the G408 error (Invalid Trailing Data for Call Forward Busy No Answer Feature and Pay Per Use blocking and Custom ring feature) cited by AT&T.<sup>6</sup>
  - 2. CLECs would be notified via a courtesy Accessible Letter in situations where SBC will begin enforcing an existing documented business rule with an electronic or manual edit. In situations where the change will occur outside a quarterly release, SBC will notify CLECs of the change through a courtesy Accessible Letter. Procedures to issue courtesy ALs will be developed and implemented.

AT&T Comments filed 11/15/02, Willard & Webber, pp. 35-37, ¶¶ 69-73; AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 23-26, ¶¶ 49-58.

This action addresses the B103 error (Additional Directory Listings issue for nonpublished accounts), which impacted AT&T.<sup>7</sup>

• Additionally, SBC will provide CLECs with a list of SBC's 3<sup>rd</sup> party vendors and software versions used by OSS that could impact CLEC connectivity. SBC will provide more detailed information in Accessible Letters to include when SBC changes a 3<sup>rd</sup> party vendor or when SBC changes to a newer version of the 3<sup>rd</sup> party software.

#### **b.** Internal Training and Awareness Sessions

- SBC will reinforce and enhance the current communication with CLECs about system changes. A document including the following items will be will be provided to the OSS Application teams:
  - Introduction and explanation of the purpose, function, and issuance procedures for courtesy ALs;
  - Guidance regarding how to improve system changes evaluations made between releases:
  - Overview of the purpose of the Exception Process and when to invoke it; and
  - Overview of the importance of adhering to the 13-State CMP when making changes to business rules and system requirements.
- SBC will develop an internal informative document that further clarifies which system changes may impact the CLECs. The document will focus on improving the existing evaluation process for system changes between quarterly releases. SBC will communicate this document to the OSS Support and System Application teams (including: OSS Customer Support, OSS Design and Support, CLEC Forums and Regulatory Support, and FCC Merger and OSS Interconnection Support teams) who are responsible for the execution of this improvement plan.
- SBC recognizes that edits which change/modify an existing LSOR business rule should go through the 13-State CMP including the Exception Process. SBC will reemphasize the importance of thorough analysis of the existing LSOR and LSPOR to minimize the times an edit change from one version is inadvertently carried over to

AT&T Comments filed on 12/19/02, DeYoung affidavit, p. 32, ¶¶ 70-71

- other versions. The L100/L101 error (PIC/LPIC Change) cited by AT&T was the result of modifying an existing document business rule.  $^8$
- SBC will reinforce the need to use proper outage notification process for situations where a system does not turn up as planned. The H325 error (More Telephone Numbers than on Account is the example) was a result of a system not coming up as planned. In the future, these failed turn ups will be handled through the normal outage notification process. For planned outages, SBC will continue to communicate to the CLEC community using the existing maintenance window schedule process.

#### C. Quality Assurance Review Program

SBC Midwest will develop and implement an internal quality assurance review program to verify completeness and accuracy of the implementation of the action plans. Specifically, SBC Midwest will implement the following items:

- SBC Midwest management will review and approve the above described action plans so that action plan elements are integrated into daily operations and management.
- SBC Midwest will design and conduct a quality assurance review to monitor adherence to the action plan objectives. A "Quality Assurance Review Program" will be documented. It will provide the detailed methods and procedures for conducting the quarterly quality reviews. The review program will include sampling procedures for each of the error types and action plans listed above.
- Reviews will be conducted on a quarterly basis for six months. The reviews
  will be performed according to the methods and procedures defined in the
  "Quality Assurance Review Program". Work papers will be documented and
  maintained. At the completion of the review, the results will be documented
  and reported to business and executive management.
- Issues identified during quality assurance reviews (i.e. unannounced changes impacting CLEC(s)) will be documented, tracked and investigated and

<sup>&</sup>lt;sup>8</sup> AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 27-31, ¶¶ 59-67

 $<sup>^9</sup>$  AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 31-32,  $\P\P$  68-69

corrective actions will be taken as warranted. All such issues will be reported to business and executive management.

The following table provides the schedule for the actions discussed in this section:

Task	Begin Date	End Date	Status
SBC develops informative document	2/13/03	3/13/03	In progress
SBC communicates informative document to OSS Application teams	1/13/03	3/15/03	In progress
SBC implements improvement plan details (as described above)  • Procedures to issue courtesy Accessible Letters are designed  • Procedures to issue courtesy Accessible Letters are implemented.	2/13/03	3/15/03	In progress
SBC provides list of 3 <sup>d</sup> party vendors and software versions (as detailed above)	2/3/03	3/20/03	In progress
SBC designs quarterly quality assurance review program	2/13/03	3/15/03	In progress
SBC executes quality review  • Implement daily oversight  • Implement quarterly reviews of DRs, CRs, and courtesy accessible letters (through sampling process)	3/13/03	<ul> <li>Daily         Oversight:         Ongoing</li> <li>Quarterly:         after each         release for         the next 2         releases</li> </ul>	To be implemented
SBC performs root cause analysis (if deviations were identified in quality reviews)  • Develop tracking process  • Determine and assign resource(s)  • Adopt corrective actions  • Report results to management	3/13/03	Ongoing	To be implemented

### 3. Status Reporting

SBC will provide a report regarding its progress on this improvement plan to the MPSC for its review in April 2003 and in July 2003 and quarterly thereafter if needed. Specifically, SBC will provide summarized results on the quarterly quality assurance review programs. Details on deviations and corresponding corrective actions will be provided. SBC will also provide a list of courtesy Accessible Letters that have been communicated to CLEC within the quarter in review.



# MPSC Case No. U-12320

# **Draft Improvement Plan**

For

**Bill Auditability** 

**February 13, 2003** 

# **Bill Auditability Improvement Plan**

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#### **Bill Auditability Improvement Plan**

# 1. Purpose

A number of CLECs raised issues relating to billing auditability and the billing dispute resolution process in their respective comments filed during November 2002. For the most part, the comments made were general in nature with few actionable specifics provided. In its January 13, 2003 Order, the Michigan Public Service Commission ("MPSC") required Michigan Bell Telephone Company ("SBC") to "include in its February 13, 2003 filing an improvement or compliance plan to address these issues." Based on the CLEC comments and information gathered from its account managers and other staff involved in providing support to CLECs, SBC understands the billing auditability issue to be difficulties in reconciling CABS billing statements and with utilizing SBC's billing dispute resolution process when issues arise.

This improvement plan addresses the general bill auditability and dispute resolution process concerns that have been raised. Status on these improvements will be monitored by SBC and shared with the MPSC. This improvement plan does not address any pending CLEC specific billing questions submitted. SBC will address those issues on an individual basis with the questioning CLEC.<sup>2</sup> SBC recognizes that further modifications to this plan may be appropriate based on the collaborative session scheduled for March 4-5, 2003. As a result, SBC will submit a modified improvement plan to the MPSC by March 13, 2003.

### 2. Issue Definition

#### A. CABS Billing Auditability

See Transcript of November 25, 2002 MPSC Public Hearing on 271 Matters specifically comments of: TDS Metrocom (T5953) and ZTel (T5961, T5967). Also, see XO Michigan, Inc's November 5, 2002 Comments on Three Months of Ameritech Performance at p. 5.

On January 27, 2003, James Denniston of WorldCom submitted specific questions regarding particular USOC and rate element applications for UNE-P via e-mail to counsel for SBC.

The billing auditability concerns appear to be focused on the Carrier Access Billing System ("CABS"). SBC Midwest implemented CABS BOS BDT<sup>3</sup> format billing for all UNE products in October 2001, consistent with the FCC's Uniform and Enhanced OSS Plan of Record (the "POR"). The CLECs in general, and WorldCom in particular, were strong proponents of the move to CABS billing. As WorldCom stated, CABS billing "results in a highly dependable and auditable bill."

CABS is an industry standard format for billing that has been in use for years in the interexchange access business as well as by CLECs. These industry standards are defined by the Ordering and Billing Forum ("OBF") which includes CLEC representation. As an OBF member, SBC adheres to the CABS billing requirements set by the OBF. This adherence ensures that all SBC Midwest CLEC customers receive a standard, non-discriminatory bill format which is documented and subject to an externally controlled change process. Accessible letters are issued to notify the CLECs of software changes to CABS; these notices include illustrative exhibits when appropriate.

SBC understands that not all CLECs may be conversant in reviewing their billing statements for auditing purposes. SBC CLEC Billing Workshops are available in each of the SBC regions to help CLECs read and interpret the CABS and RBS bills received from SBC. This 1-1/2 day workshop includes information on identifying the components that make up the CABS and Resale bills as well as using Daily Usage File ("DUF") and Ameritech Electronic Billing System ("AEBS") files. The workshop is available on an ongoing basis for scheduling; additional sessions can be added as needed based upon CLEC demand. Requests for any "on demand" courses are typically added to the

CABS BOS BDT stands for Carrier Access Billing System Billing Output Specifications Bill Data Tape, which is a guideline format overseen by the Ordering and Billing Forum, an industry organization that provides standard billing guidelines.

Direct Testimony of A. Earl Hurter on Behalf of MCImetro Access Transmission Services, Inc. dated September 25, 2000, pg 5,line 12-13. Mr Hurter also indicates in his testimony that the CABS BOS format provides "efficient bill receipt, audit and payment is predicated on a predictable, well defined electronic bill format which allows for levels of summarization by end office, jurisdiction, LATA and state". (pg 2, lines 17-19)

schedule within a few weeks. In 2002, this Billing workshop was conducted seven times with 20 CLECS participating in one or more sessions.<sup>5</sup> Three workshops were cancelled due to no enrollment.

BearingPoint conducted extensive testing of SBC Midwest's CABS billing, evaluating the billing of recurring, non-recurring, and fractional charges as well as sums and cross totals on CABS bills. BearingPoint found that SBC exceeded the 95% benchmark for each of these categories. The BearingPoint Report issued on October 30, 2002 specifically evaluated recurring charges on UNE-P bills and determined that 98.9% of these charges were consistent with applicable tariff and/or contracts. (See TVV9-6, at p. 1000) Non-recurring and fractional rates on UNE-P bills were evaluated under TVV9-9 testing and the results indicated 99.2 % of the rates consistent with applicable tariff and/or contracts. (See p. 1002)

#### **B.** Billing Dispute Resolution

SBC's billing claims and adjustments process begins with the LSC Claims/Dispute organization, which is responsible for processing CLEC billing claims and disputes. SBC's billing claim dispute resolution process is documented on CLEC Online and references the escalation procedures available to a CLEC dissatisfied with the disposition of its claim. If the CLEC is still dissatisfied after the escalation process is complete, it can enter into the Alternate Dispute Resolution ("ADR") process as outlined in the CLEC's interconnection agreement. The ADR process generally begins with the Account Manager working with the CLEC to resolve the billing dispute, then notifying the LSC of the resolution. If the CLEC is still not satisfied with the resolution, escalation procedures are generally provided for in the ADR process to bring the issue to SBC upper management. A CLEC that does not have an interconnection agreement at the time of the billing dispute would also use its account manager to escalate and resolve billing disputes.

Of the CLECs commenting on this issue, none participated in the available training in 2002.

Go to <a href="https://clec.sbc.com/clec">https://clec.sbc.com/clec</a>, click on CLEC Handbook, choose a state's handbook i.e. Michigan, and then select Billing from the menu provided on the left side of the screen.

BearingPoint conducted comprehensive testing of SBC Midwest's support of CLEC billing related claims and inquiries. Testing included documentation reviews, interviews with SBC personnel and on site observations of help desk operations. BearingPoint found that the billing support process clearly included procedures for accepting, acknowledging, investigating, tracking, and closing CLEC claims, issues, and inquiries. (See PPR10-3 through PPR10-5, pp. 668-671)

## 3. Actions

#### A. CABS Billing Auditability

SBC will take the following actions to address the CLEC and MPSC concerns regarding billing auditability:

First, confirm that the CLEC is familiar with the support that is available -

- When contacted, SBC account managers will advise CLECs interested in modifications to the CABS BOS standards (e.g. call flows, interconnection agreement pricing schedules, tariff page references, additions) to submit their business need to OBF.
- SBC Midwest Account Managers will remind their clients, as appropriate, of the ongoing availability and value in attending the SBC CLEC billing workshops. A general reminder also will be provided at the SBC CLEC User forum during or before April 2003.

Second, clarify with the CLEC the specifics of its concerns -

- Given the nonspecific nature of the Bill Auditability comments submitted by many of the CLECs, the issue will be added as an agenda item to the SBC CLEC User Forum during or before April 2003.
- At that forum, SBC will extend to the CLEC community, an invitation to schedule on an individual basis, a working session with SBC to discuss company specific billing auditability concerns.

Third, identify additional available support options -

- SBC will investigate the availability of bill auditability training sessions offered by external vendors and provide results of that investigation to the account managers and for CLEC Online updates. Initial evaluation will be completed by March 15, 2003.
- SBC will evaluate the need to develop a CABS billing overview presentation to be delivered during a SBC CLEC User forum. An evaluation timeframe will be provided at the March 4, 2003 CLEC Collaborative.
- SBC will assess the viability of posting limited industry documentation on the CLEC Online website. Initial evaluation will be completed by March 15, 2003.
- The review of the existing complement of CLEC workshops and Operation Support System classes is an ongoing activity. Participant feedback from the 2002 Billing Workshop sessions are considered in identifying course improvements; an evaluation timeframe for the review of the Billing Workshop will be provided at the collaborate session scheduled for March 4, 2003.
- SBC will evaluate the feasibility of other training delivery methods. An evaluation timeframe will be provided at the March 4, 2003 CLEC Collaborate.

#### **B.** Billing Dispute Resolution

SBC will take the following actions to address the Dispute Resolution Process concerns raised.

The following actions will be taken to improve the CLECs' understanding of the billing dispute resolution process.

- Managers from the LSC's Claims/Dispute Resolution organization will be scheduled to provide an overview of the claim submission process at a SBC CLEC User Forum meeting during or before April 2003.
- When contacted, the Account Management teams will work with the LSC to schedule CLEC specific meetings to address their billing claim issues.

The following SBC internal training and documentation improvements will be implemented to improve the quality of the billing dispute resolution process.<sup>7</sup>

See Z-Tel November 5, 2002 Comments on Three Months of Ameritech Performance Results at pp.6-8. Similar comments are made in the Transcript of November 25, 2002 MPSC Public Hearing on 271 Matters; see T5968-T5969.

- The LSC Billing representative initial training course will be updated to address the gaps identified by the CLEC comments (e.g., stress process and communication with the CLEC, UNE-P product knowledge).
  - Classroom exercises will be incorporated to ensure sufficient practice occurs and mastery testing is complete.
  - The enhancements will be included in the new initial class scheduled for April 2003.
- Training for existing Billing Service Representatives will be developed and delivered to reinforce product understanding, highlight the importance of proper status with the customer and detailed claim responses, and review most common systems used for their segment. Development of the training is scheduled for completion on 3/31/03. Training sessions will be scheduled in April through June 2003.
  - This will be an interactive session that will allow students to take time for handson practice.
  - At the conclusion of the training, the participants will be given a mastery test.
- A Claim/Dispute resolution checklist will be developed and shared with the claim/dispute service representatives. The checklist will enable the service representative to perform the claim process steps in a methodical manner ensuring that every step is covered. This checklist is under development and will be implemented on or before 2/20/03.
- SBC will design and implement an internal quality review process that will perform a random sampling of processed claims to ensure accuracy and completeness. The process is currently under development and will be implemented on March 3, 2003.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status							
Bill Auditability Support Actions										
Clarify the Issue(s)										
<ul> <li>Schedule issue for future CLEC User Forum agenda schedule for high level discussion</li> </ul>	2/20/03	2/21/03								
Conduct CLEC forum discussion	TBD	April 2003								
Identify External Bill Audit Training & Documentation										
<ul> <li>Identify external CABS BOS/BST training sources</li> </ul>	1/27/03	3/15/03	In Progress							
<ul> <li>Identify external industry documentation and publications</li> </ul>	1/27/03	3/15/03	In Progress							
<ul> <li>Update CLEC Online w/findings (if applicable)</li> </ul>	3/3/03	3/20/03								
CLEC Training's review/update of CLEC Billing Workshop	TBD	TBD								
Explore alternate delivery of CLEC training	TBD	TBD								
Dispute Resolution Process Improvements										
Claim Submission Process Overview Presentation	2/10/03	April 2003	In Progress							
<ul> <li>Determine presentation material(s)</li> </ul>	2/10/03	3/14/03	In Progress							
Present Claims Process Overview @ CLEC forum	TBD	April 2003								
<ul> <li>Provide immediate team coaching at core meeting, team meeting &amp; January &amp; February Segment meetings on importance of complete/accurate dispute disposition responses</li> </ul>		2/28/03	In Progress							
<ul> <li>Identify additional process improvements via weekly LSC segment meetings</li> </ul>	1/29/03	Ongoing	Ongoing							
<ul> <li>Design and implement a Billing Claim/Dispute response checklist and provide training to all Billing Claim/Dispute Service Representatives.</li> </ul>	1/27/03	2/19/03	In Progress							
Determine and assign resource to lead checklist development	1/27/03	1/27/03	Completed							
<ul> <li>Develop checklist for SR to use when processing claims</li> </ul>	1/27/03	2/14/03	In Progress							
Conduct Training	2/18/03	2/19/03								

	Task	Begin	End	Status
•	Develop and implement a quality review process for validating the completeness of CLEC billing claim resolution responses	2/10/03	3/3/03	In Progress
	Develop Service Rep validation scorecard	2/10/03	2/28/03	In Progress
	<ul> <li>Conduct validation sampling process</li> </ul>	3/3/03	Ongoing	
•	Develop and deliver enhanced training to all Billing Claim/Dispute Service Representatives.	02/03/03	6/30/03	In Progress
	<ul> <li>Determine and assign resource to lead development effort</li> </ul>	02/03/03	6/30/03	In Progress
	<ul> <li>Produce training package</li> </ul>	02/03/03	03/31/03	In Progress
	Create training schedule	03/14/03	03/31/03	
	Conduct Training	April 2003	06/30/03	

# 4. Status Reporting

SBC will provide a report regarding its progress on this improvement plan to the Commission for its review in April 2003 and in July 2003 and quarterly thereafter if needed.



One Radnor Corporate Center 100 Matsonford Road Radnor, PA 19087 Tel: +1.610.263.8000 www.bearingpoint.com

February 13, 2003

Mr. John Hudzik Vice President, Long Distance Compliance 2000 West Ameritech Center Drive 4G42 Hoffman Estates, IL 60196

RE: DRAFT COMPLIANCE PLANS IN MPSC CASE NO. U-12320

Dear Mr. Hudzik:

In the matter of Michigan Public Service Commission (MPSC) Case No. U-12320, SBC has requested BearingPoint to review the following three documents:

- Draft Compliance Plan for Customer Service Inquiry Accuracy
- Draft Compliance Plan for Repair Coding Accuracy
- o Draft Compliance Plan for Directory Listing Update Accuracy

BearingPoint believes that the documents provide a detailed explanation of how SBC plans to address operational concerns identified in BearingPoint's reports, discussed in written comments to the MPSC, and described during technical workshops held at the MPSC. The documents reviewed address the issues identified in the original BearingPoint exceptions, address comments expressed by the MPSC and CLECs, and provide an adequate foundation for an independent examination of the compliance plan assertions.

As requested by SBC, BearingPoint is prepared to develop and conduct an independent examination based on the draft compliance plans reviewed, subject to further guidance provided by SBC following the MPSC collaboratives on this subject to be held March 4-5, 2003 in Lansing, Michigan.

Sincerely,

John Eringis Managing Director

BearingPoint, Incorporated

Mary Ann Quinn Managing Director

BearingPoint, Incorporated

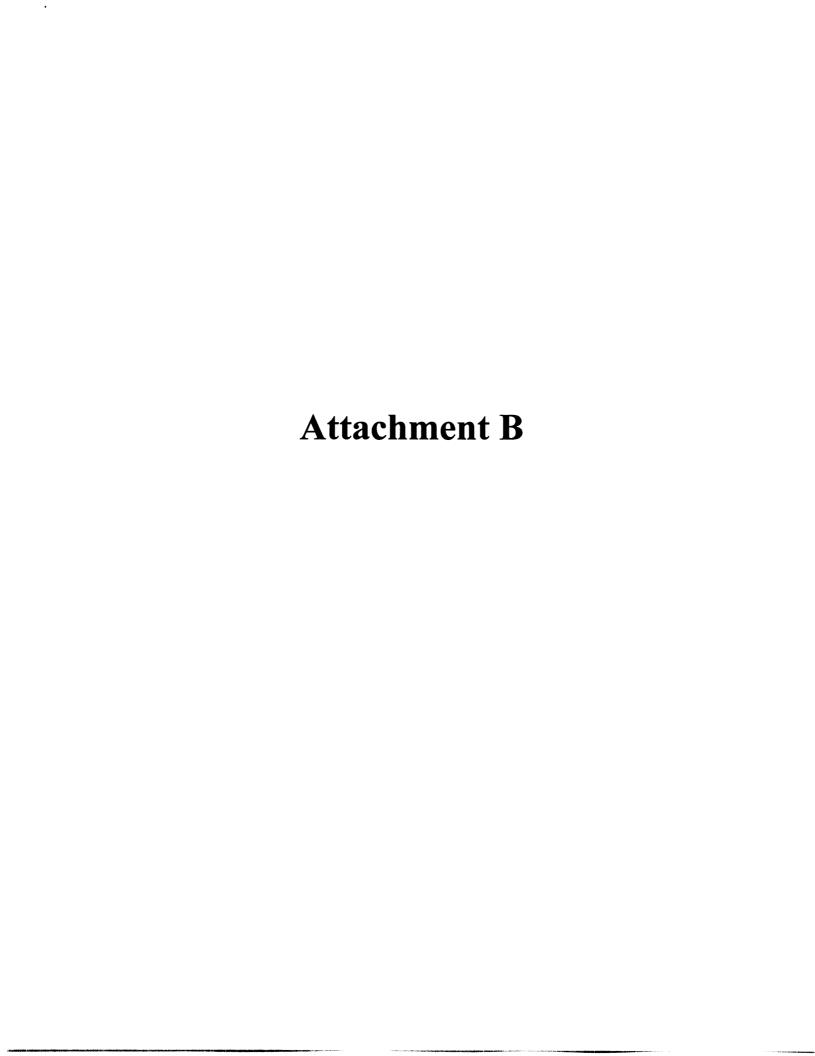
Jory Ann Guin

# MPSC Case No. U-12320 Line Loss Notification Interruption Report Data as of January 2003



CLEC Name	Date of Occurrence	Brief Description of "Loss" Event	Date Loss Restored to Customer	Accessible Ltr Number	Accessible Ltr Distribution Date	Single CLEC occurrences not requiring AL				
No Occurrences in January, 2003										

Page 1 of 1 2/13/03





Cynthia J. Mahowald Vice President and General Counsel

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February 15, 2003

Michael Hirrel, Esq.
Telecommunications Task Force
Antitrust Division
U.S. Department of Justice
1401 H Street NW, Suite 8000
Washington, DC 20530

Re: Michigan 271 Application, WC Docket No. 03-16

Dear Mike:

Pursuant to your request, attached is a response to your questions on the CABs reconciliation. Please let me know if you have any questions or need any additional information. I apologize for the delay in providing you with this information.

Sincerely,

Enclosure

cc: Bre

Brent Marshall Layla Seirafi-Najar As discussed in the Affidavit of Michael Flynn, in October 2001 SBC Midwest completed a conversion process to consolidate billing for UNE-P charges into CABS.\(^1\) As a final quality assurance measure, in January 2003 SBC Midwest conducted a comparison of its CABS UNE-P billing records with the ACIS provisioning records for those same UNE-P lines.\(^2\) The bulk of the results of this one-time reconciliation will appear in CLEC bills for February.

In the aggregate, approximately 76,000 UNE-P circuits were added and 62,000 UNE-P circuits were deleted from billing for 37 CLECs operating in Michigan. The addition and deletion of UNE-P circuits resulted in the issuance of approximately \$9.3 million in credits and \$7.6 million in debits (with a net impact of \$1.7 million in credits) to the impacted CLECs. Prospectively, SBC Midwest estimates that the addition/deletion of UNE-P circuits will result in an aggregate increase in billing for monthly recurring charges of approximately \$220,000 (or less than 1.4% of total UNE-P Michigan billing for December 2002). SBC Account Team representatives have contacted impacted CLECs to provide the results of the reconciliation and to work with them to resolve any outstanding issues.

Before the reconciliation, the provisioning (ACIS) and billing (CABS) records for the "added and deleted" UNE-P circuits referenced above did not match. As a result, new service order activity on those circuits sometimes could not post mechanically, and would fall out for manual handling. Now that the ACIS and CABS records have been synchronized, future service order activity for these UNE-P circuits should post without need of manual handling, and billing inaccuracies resulting from the lack of synchronization between ACIS and CABS on these UNE-P circuits should be eliminated. Further, the database reconciliation should resolve disputes filed by CLECs for billing inaccuracies related to lack of synchronization between ACIS and CABS for the UNE-P circuits in question.

Also, the BearingPoint Test for UNE-P confirmed that SBC Midwest's CABS system is producing accurate and complete bills for UNE-P. See BearingPoint Final Report test points 9-26 and 9-29 at pages 1009-1010 (Appendix C Tab 114). In test reports produced by BearingPoint for the states of Illinois, Ohio and Wisconsin subsequent to the migration of UNE-P billing to CABS, BearingPoint determined that SBC Midwest posts UNE-P service orders to CABS in a timely manner, and that UNE-P billing produced by CABS is complete and accurate. These results apply equally to Michigan.

<sup>&</sup>lt;sup>1</sup> See. Affidavit of Michael Flynn, ¶ 4, fn. 4 (Flynn Affidavit). This project was undertaken at the request of the CLECs. Prior to the conversion, UNE-P switch port charges were billed out of RBS, while UNE-P loop charges <sup>2</sup> See, Flynn Affidavit, fn. 6.

UNE-P service orders first post to ACIS, and then post to CABS. See, Flynn Affidavit, ¶9.